Memorandum

Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

TO:

William Kutash, Environmental Administrator

FROM/THROUGH:

_____Jim Dregne, Environmental Manager Elizabeth Knauss, Environmental Manager

DATE:

10/5/06

FILE NAME: TECO Central Operations Center

PROJECT #: 296647

PROGRAM:

Hazardous Waste

COUNTY: Hillsborough

TYPE OF DOCUMENT:

Warning Letter Closure

REQUESTED ACTION: Signature

DESCRIPTION OF VIOLATIONS: Used oil transfer facility storing oil more than 35 days without a permit. Failure to comply with secondary containment and labeling requirements. Improper disposal of a small quantity of solvent contaminated rags. Universal waste was stored in a container in poor condition.

STATUS OF CORRECTIVE ACTIONS: TECO presented additional records and calculations demonstrating compliance with used oil transfer facility requirements. The remaining minor violations were corrected promptly..

STATUS OF PENALTY ASSESSMENT: Recommend Closure without formal enforcement

PENALTY: Not Applicable

Amount:

Costs & Expenses:

Total: \$8,750.00

Secretary Approval Not required



Department of Environmental Protection

Jeb Bush Governor Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

October 9, 2006

Ms. Beverly Morgan Tampa Electric Company P. O. Box 111 Tampa, FL 33601-0111

Re:

Response to Warning Letter #296647

Central Operations Center

FLD 981 477 904 Hillsborough County

Dear Ms. Morgan:

The Department has reviewed your letter of September 1, 2006 responding to the alleged violations noted in the warning letter. The additional disposal receipts along with you statement that oil was removed from the transfer facility (if present) on each visit resolves the remaining outstanding violation. The Department had previously accepted your calculations demonstrating the adequacy of the transfer facility's secondary containment area.

As the remaining violations were relatively minor in nature, and were promptly corrected, the Department is closing this case file. If you have any further questions, please contact Elizabeth Knauss at 813/632-7600 ext. 383.

Sincerely yours,

Willliam Kutash

Waste Program Administrator

Southwest District

WMK/ebk

cc:

Mike Redig, HW Management

Kelley Boatwright, HEPC

compliance file



September 1, 2006

Ms. Elizabeth B. Knauss Environmental Manager Hazardous Waste Compliance Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926

Re: Tampa Electric Company

Central Operations Center

Permit Number FLD 981 477 904

Warning Letter #296647

Southwest District

Via Fax and FedEx Airbill No. 7921 9661 8280

On March 14th, 2006, a hazardous waste inspection was conducted at the referenced facility. In a Warning Letter received on July 13th, 2006 the Department identified several concerns requiring a response from Tampa Electric Company. During a scheduled meeting on August 15, 2006 between TEC and the Department, a request was made by the Department to obtain additional information.

This correspondence is structured by restating the Department's concern as addressed on the Warning Letter, followed by TECs Background and Corrective Action response.

1. Solvent Wiper Identification & Disposal (Failure to conduct a hazardous waste determination on F005 solvent contaminated wipers.) 40 CFR 262.11

Background: During a walk-through of the Transformer Repair Shop, a container of Lacquer Thinner with labeling indicating MEK as an ingredient was observed. MEK is one of 11 listed spent solvents that the EPA has determined to pose a risk to Human health and the environment as it carries both a flammable and toxic hazardous waste code.

Attachment #1 is the MSDSs available on site for the USA Lacquer Thinner. Please note that the ingredients do not indicate that the blend contains MEK. At the time of the Department's inspection, which resulted in the above finding, TEC staff was relying on this MSDS to determine proper use and disposal of waste rags from cleaning operations using this solvent.

Corrective Action: Upon discovery of this discrepancy, the use of this thinner for cleaning operations at the Central Operations Center (COC) was discontinued. TEC has substituted isopropanol (denatured alcohol) for transformer cleaning activities at the Repair Shop. All Lacquer Thinner containers have been moved to the Paint Shop for proper use & disposal. In addition, TEC issued a memo on July 21, 2006 to all Energy Delivery employees to review the chemical evaluation & inventory program. A copy of this memo was submitted at the August 15th meeting.

2. Storing Used Oil >35 days without a Permit "Failure to obtain a permit as a Used Oil Processor" 40 CFR 279.43 & FAC 62.710.800(1)

Background: During the March inspection, a preliminary review of used oil records could not verify whether monthly pickups by Seimen's USFilter Recovery Services had occurred at the Used Oil Transfer Facility at the COC.

Ms. Elizabeth B. Knauss September 1, 2006 Page 2 of 2

There are several departments within COC that maintain individual records of used oil pickups. These areas include Substation Operations, the Garage, and the Transformer Repair Shop at Investment Recovery.

Although we do not perform any of the activities defined as "processing", processors are defined as including "persons who store used oil for longer than 35 days at a time and who have at least 25,000 gallons of used oil capability".

Corrective Action:

A spreadsheet was provided to the Department at the initial meeting along with Service Orders obtained from USFilter dating back to January 2006. These records demonstrated that used oil was picked up at this facility more frequently than every 35 days.

Attachment #2 complies with the Department's additional request for used oil records covering January – December of 2005; which also demonstrate compliance.

In discussions with USFilter staff, it was determined that the used oil transfer facility (i.e. the tanker trailers) at the COC is checked during each visit to the site and any used oil at this location is pumped out. Additionally, while it is already the driver's practice to visit and empty all stationary tanks and mobile tankers during each visit, Investment Recovery has implemented new procedures to document this effort and ensure compliance. *Attachment 3* is a letter dated August 8, 2006 from USFilter's transportation manager, adjusting COC's pickup schedule to a 14 day interval. A clipboard with a sign-in sheet captures the date of the used oil run, the driver's signature and any volume and location of oil picked up. This record will also document attempts when no used oil was available for collection.

TEC believes the above information and the proactive measures taken to ensure compliance with all applicable rules, should resolve the Department's remaining concerns regarding the waste management program at the COC. Therefore, we respectfully request the closure of this matter based on this information and our discussions at our recent meeting.

As always, TEC appreciates the Department's cooperation and willingness to work with us to resolve any compliance issues at any of our facilities. Please contact me at (813) 228-1052 if these issues need to be explored in greater detail.

Sincerely,

Beverly Morgan

Environmental Technician

Bevery mongan

Environmental Health & Safety

EHS/rlk/BJM260

Enclosure



Material Safety Data Sheet

United Specialties of America
71 Hargrove Grade
Palm Coast, Florida, 32137
PHONE: 904-446-4595. OR FAX: 904-446-4627

CHEMICAL EMERGENCY CALL CHEMTREC: 1-800-424-9300 (24hrs)

DATE OF PREPARATION AND REVIEW: 05/05/2003

H.M.I.S.

HEALTH

2

FLAMMABILITY REACTIVITY

0

These ratings should be used as part of a fully implemented H.M.I.S. program.

SECTION I

TRADE NAME: LACQUER THINNER
MANUFACTURER CODE I.D. LT-102 2 3 0 H

PRODUCT NAME: LACQUER THINNER HMIS CODES: H F R P

PRODUCT CODE: LT-102 2 3 0 H

SECTION I - MANUFACTURER IDENTIFICATION

United Specialties of America 71 Hargrove Grade Palm Coast, Florida, 32137

PHONE: 904-446-4595 OR FAX: 904-446-4627

CHEMICAL EMERGENCY CALL CHEMTREC: 1-800-424-9300 (24hrs)

SECTION II - HAZARDOUS INGREDIENTS/SARA III INFORMATION

VAPOR PRESSURE WEIGHT REPORTABLE COMPONENTS CAS NUMBER mm Hg @ TEMP PERCENT

* METHYLBENZENE 108-88-3 22 68 67.6
OSHA PEL: 100 PPM, ACGIH TLV: 50 PPM, OTHER: N/A
2-PROPANONE 67-64-1 185.5 60 F
OSHA PEL: 1000 PPM, ACGIH TLV: 750 PPM, OTHER: N/A
* METHYL ALCOHOL 67-56-1 97.68 68 F 11.2
OSHA PEL: N/A, ACGIH TLV: 200 PPM, OTHER: N/A
* METHYL ISOBUTYL KETONE 108-10-1 .75 50 4.7

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OSHA PEL: N/A, ACGIH TLV: 50 PPM, OTHER: 75 PPM

2-ETHOXYETHYL ETHER 111-15-9 2.0 68 F

OSHA PEL: N/A, ACGIH TLV: 5 PPM, OTHER: N/A

* Indicates toxic chemical(s) subject to the reporting requirements of section

313 of Title III and of 40 CFR 372.

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING RANGE: 133 F - 313 deg F SPECIFIC GRAVITY (H2O=1): 0.85

VAPOR DENSITY: HEAVIER THAN AIR EVAPORATION RATE: SLOWER THAN ETHER

COATING V.O.C.: 7.08 lb/gl MATERIAL V.O.C.: 7.08 lb/gl

SOLUBILITY IN WATER: NON SOLUBLE APPEARANCE AND ODOR: SOLVENT ODOR

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: 45 F METHOD USED: TCC

FLAMMABLE LIMITS IN AIR BY VOLUME- LOWER: 1.2 UPPER: 36.0

EXTINGUISHING MEDIA: FOAM, CO2, DRY CHEMICAL, WATER FOG

SPECIAL FIREFIGHTING PROCEDURES

RESPIRATORY EQUIPMENT SHOULD BE WORN TO AVOID INHALATION OF CONCENTRATED VAPOR.WATER SHOULD NOT BE USED EXCEPT AS FOG TO KEEP NEARBY CONTAINERS COOL.

UNUSUAL FIRE AND EXPLOSION HAZARDS

EXTREMELY FLAMMABLE. VAPORS MAY IGNITE EXPLOSIVELY AND/OR CAUSE FLASH FIRES.

ELIMINATE SOURCES OF IGNITION. NO SMOKING. USE ADEQUATE CROSS VENTILATION

SUFFICIENT TO REMOVE ODOR OF SOLVENT AND VAPORS.

SECTION V - REACTIVITY DATA

STABILITY: STABLE

CONDITIONS TO AVOID

EXCESSIVE HEAT, POOR VENTILATION, CORROSIVE ATMOSPHERES, EXCESSIVE AGING.

INCOMPATIBILITY (MATERIALS TO AVOID)

STRONG OXIDIZING AGENTS, STRONG ACIDS AND OXIDIZING MATERIALS, ALKALINE MATERIALS.

HAZARDOUS DECOMPOSITION OR BYPRODUCTS

CARBON MONOXIDE, CARBON DIOXIDE, AND OXIDES OF NITROGEN.

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

SECTION VI - HEALTH HAZARD DATA

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE

ACUTE SIGNS OF OVEREXPOSURE COULD BE HEADACHE, DIZZINESS NAUSEA, UPPER

RESPIRATORY DRYNESS OR IRRITATION, DROWSINESS, MENTAL DEPRESSION OR NARCOSIS.

SKIN AND EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE

EYE CONTACT: SEVERE IRRITATION, TEARING, REDNESS AND BLURRED VISION.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE

SKIN CONTACT: CAN DRY AND DEFEAT SKIN CAUSING CRACKS, IRRITATION, AND DERMATITIS.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE

INGESTION: CAN CAUSE GASTROINTESTINAL IRRITATION, VOMITING, NAUSEA, AND DIARRHEA.

HEALTH HAZARDS (ACUTE AND CHRONIC)

INHALATION-DIZZYNESS, BREATHING DIFFICULTY, HEADACHES, LOSS OF COORDINATION. EYE

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2005 Pick up Dates at COC by USFilter

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01-04-05	Garage	400	p'Ent.
01-19-05	Txf. Shop	6000	TOTO
02-01-05	Garage	110	co icctioning
03-04-05	Garage	233	of the state
03-22-05	Substation	5000	Sep 1 2006 Southwest District
04-13-05	Substation	3536	uth.
04-13-05	Garage		425 CC 300
04-14-05	Garage	250	$^{\circ l}\mathcal{D}_{lo}$
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04-15-05	Substation	3609	*(7
04-15-05	Substation	2548	
05-12-05	Garage	222	
05-13-05	Txf. Shop	975	
06-08-05	Garage	425	
06-23-05	Substation	1600	
06-23-05	Substation	2408	
07-15-05	Garage	300	
07-18-05	Garage		500 1000
08-03-05	Txf. Shop	4008	
08-03-05	Substation	4720	
08-04-05	Substation	535	
08-11-05	Garage	150	
08-12-05	Substation	453	
09-01-05	Garage	359	
09-01-05	Garage	275	
09-15-05	Txf. Shop	4320	
09-15-05	Substation	400	
09-23-05	Substation	2754	
10-05-05	Txf. Shop	1868	
10-12-05	Garage	200	
10-26-05	Garage	325	
11-04-05	Substation	3400	
11-04-05	Substation	2475	
11-09-05	Substation	1300	•
11-09-05	Substation	3400	
11-10-05	Txf. Shop	2372	
12-02-05	Garage	100	
12-19-05	Garage	420	

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Reuse Solvent QA & QC Yes No Yes No /	Rep Initials		that to the best of my knowledge, the information	on presented herein is correct.	national contains PCB's or is d and accurate, and I am author	determined to be a har nized to sign on behalf	Ezardous waste. I certify all of the GENERATOR.
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Used solvent has no unusual odur	Program will be utilized as an e- e Program. I further certify that al- ite or other objectionable substan- iulting from, and incidental to, non- administrative practices, and ope- plete certification. Rep Initials th assembly is in good working is unobstructed rita Cleaner is properly grounder	as defined in 40 CFR initial if Do-it-yourself or yourself or yourself or yourself or the GENERATOR hereby certifies or a used of as defined in 40 CFR part of the thirty of thirty of the thirty of the thirty of thirty of the thirty of thirty of the thirty of thirty	collection center EPA IDV Interview of the material collected from the GENERATOR'S facility by US Falter does not contain any PCB's as defined in 40 is or been mixed with a listed or characteristic hazardous waste as defined in 40 CH H 261. If the material collected is 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR hereby esumption under 40 CFR Part 279 has been robusted. The GENERATOR will be responsible for any and all costs is sposal, testing, and transportation if the material contains PCB's or is deliremined to be a hazardous waste. I certify is information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR, and materials are properly classified, described, packaged, marked and labeled, and are in proper condition for able regulations of the Department of Transportation. Designated Eacility 105 South Algarander Street Part City, Ft. 3363 (800) 235-0189, Ext 3

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Reuse Qualification Statement By signing this document, I hereby certify that I understand the used US Filter degrease petroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse Program will	be utilized as an effective	Initial if Conditionally Exempt Small Quantity Ger as defined in 40 CFR 261.5 Initial if Do-It-yourself collection center	EPA IO
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Authorization Signature Lagree to pay for the above services and/or products and to be bound by the forms and or		" US Filer Transport, Inf 1657, Centeroort, Inf 1657, Centeroo Dr., Suite 108 US DOT ID#: 828559 EPA ID#: INFR00002279	
and on the reverse suiterof this document.	Foo	EMARGENCY CONTACT CHEMTREC (800) 424-8300	nonticalling
416683	SIGNATURE / DATE	DRIVER SIGNATURE / DATE	RECEIVED AT PLANT / DATE LF 070 Rev B

1-000-235-0109 -**CUSTOMER CONTACT**

SITE NUMBER NAME AND ADDRESS

2200 E SLIGH AVENUE

TECO-EAST SLIGH

MARCUS GARDNER

813-238-4111

PHONE NUMBER

56331406

TAMPA

SPECIAL NOTES ALERT

8418

SERVICE ORDER

	A Siemens Business
	US FILTER RECOVERY SERVICES (MID-ATLANTIC), INC.
-	14950 Heathrow Forest Pkwy, 250, Houston, TX 770

USED OIL PICK UP, NLM

33401

NUMBER 1293501

PAGE

CALL PROBLEM ORDER ORIGIN RC CC

PRIORITY

CALL WAS TAKEN ON 04-13

USED OIL

PROBLEM SYNOPSIS, AS REPORTED

AT 1229 BY MCCL

ROUTE

NOHE HEEDED ASSIGNED TECH 5 61005

540004 PLANT CITY DEFAU

WANUMBER

PROMISE DATE, TIME

P.O. NUMBER

MA0227663 04-13-05 VEHICLE NO. TRAILER NO. UPTIME UNIT NO. ST ARRIVE DATE ARRIVE TIME CLOSE DATE **CLOSE TIME** JOB COMPLETE 96126 SERIAL # # CONT TYPE PART / DESCRIPTION QUANTITY SHIPPING DESCRIPTION GLYCOL SNIFFER C-D-T B-OILD. GA OIL PROCESSING REQ FIFC COL-UDAGA X Cumbustible liquids n.o.s. (Fetroleum Uil GA), 3, NA, 1993, PGIII USED OIL AUTO GA HH

Reuse Qualification Statement

By signing this document, I hereby certify that I understand the used US Filter degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse Program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the Brogram, I further certify that any used degressing fluid so returned to US Filter has not been mixed with jizadirdous years for other objectionable substances. All constituents that may be present in the degressing fluid set contaminants //tyuling from, and incidental to, normal use of the solvent as a degresser or cleaner. I have reviewed out physical societies and the solvent as a degresser or cleaner. I have reviewed out physical societies and complete certification.

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Lagree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

Initial if Conditionally Exempt Small Quantity Generator

as defined in 40 CFR 261.5

The GENERATOR hereby certiles that the material collected from the GENERATOR'S tackity by US Fifter does not contain any PCB's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used of as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR hereby certilies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is gotermined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR. Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, merced and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information: US Fitter Transport, Inc. 1657 Commerce Dr., Suite 10B

US DOT ID#: 828559 South Bend, IN 46628 EPA ID#: INR000022796

EMERGENCY CONTACT CHEMTREC (800) 424-8300

DRIVER BIGNATURE / DATE

Dosignated Eacility

((DO) 235-0189, Ext 3

PA ID#: FLD0656806

105 South Alexander Stree Plant City, FL 33563

Generator

UNKHOWN STATUS

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LF 070 Rev. B

A Siemens Business US FILTER RECOVERY SERVICES (INDATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77
1-800-235-0189 CUSTOMER CONTACT MARCUS DARDNER PHONE NUMBER 813-238-4111 SITE NUMBER NAME AND ADDRESS 56351406 TECO-EAST SLIGH 2200 E SLIGH AVENUE
TAMPA
VEHICLE NO. TRAILER NO. PART / DESCRIPTION
COL-UDAGA USED OIL AUTO GA B-DILB OIL PROCESSING REG
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A Siemens Business US PILTER RECOVERY SERVICES (NO. ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032	of April	AY ALER	IAL NOTES	SERVICE ORDER
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Fusible link operational Authorization Signature
I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document PRINT CUSTOMER NAME CUSTOMER SIGNATURE / DATE

Initial if Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.5 Initial if Do-it-yourself collection center	Generator EPA ID# _	ликиом	STATE
The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by US F CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the rebuttable waste presumption under 40 CFR part 279 has been rebutted. The GENE including, but not limited to, proper disposal, testing, and transportation if the material populars PCB's of that to the best of my knowledge, the information presented herein is correct and acquirale, and I am a Shipping Declaration: This is to certify that the above-named materials are properly classified, described, packaged, marke transportation according to the applicable regulations of the Department of Transportation.	defined in 4 ess than 1, ERATOR w or is determ outhorzed s	to CFR 261. If the m 200 ppm, or the GEI ill be responsible for ined to be a hazard o sign on behalf of t	NATIONAL CONTROL NETWORK NETWO
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DRIVER SIGNATURE / DATE

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R Used solvent has no unusual odor Lid is unobstructed Parts Cleaner is clean (front/back) Parts Cleaner is properly grounded Fusible link operational Authorization Signature Lagree to pay for the above services and/or products and to be bound by. and on the reverse side of this document. PRINT CUSTOMER NAME CUSTOMER SIGNATURE / DATE Generator UNKHOWN STATUS

CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as dolined in 40 CFR 261. If the material collected is a used of as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR hereby certifies that the robuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

transportation according to the applicable regulations of the Department of Transportation.

Transporter Information: US Filter Transport, Inc. 1657 Commerce Dr., Suite 108 US DOT ID#: 828559 South Bend, IN 46628 EPA ID#: INFI000022798 EMERGENCY CONTACT CHEWTREC (800) 424-9300-

Designated Facility 105 South Alexander Street Plant City, FL 33563 (800) 235-0189, Est 3 PA ID#: FLD065680613

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Yes No Yes No Yes No Used solvent passed yisual inspection Used solvent has no injusual odor	Light assen		•	transportation according to the applic	ned materials are properly classified, able regulations of the Department of	Transportation,	nd labeled, and are in proper condition for
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Authorization Signature I sgree to pay for the above services and/or products and to be bound and on the reverse side of this document.	by the terms ar	nd conditions get for	1)	South Band, IN 46628 EMERGENCY CONTACT CHEMTE	EPA ID#: INR000022798	(800)	Da. 100 Ext 3
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/ CUSTOMER CONTACT		JO.					11.) - /	PAGE I	OF I
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Reuse Qualification Statement By signing this document, I hereby certify that I understand the used.	US Filter degra	asing fluid (i.e. N	dineral	spirits,	as defined in 40 CFI	R 261.5	100		VOLYNICA CHARLOS	UTATE NW
petroleum naphtha) returned to US Filter for inclusion in the US Filter substitute for chemical product. For the purpose of qualifying to participal	leuse Program	will be ubized a	that an	effective ov used	Initial If Do-It-yourse The GENERATOR hereby certifie	is that the material collected from the	GENER		N 10-4	
degreasing fluid so returned to US Fifter has not been mixed with hazardor	as waste or other	r objectionable sui	batance	68.	CFR 761 and is not hazardous wa	aste or been mixed with a listed or ch	aractens	tic hazardous waste as defi	ned in 40 CFR 261. If the	ne material collected is
All constituents that may be present in the degreesing fluid are contaminated the solvent as a degreeser or cleaner. I have reviewed our physical fail					certifies that the robuttable waste	art 279, the GENERATOR certifies to presumption under 40 CFR Part 27	o has be	en rebutted. The GENERA	TOR will be responsible	e for any and all costs
procedures and based on this review do willing make this true, accurate ar	d complete certif	fication.	. 1		including, but not limited to, prope that to the heat of my knowledge.	r disposal, testing, and transportation the information presented herein is	n if the m	salenal contains PCB's or is	determined to be a haza	ardous waste I certify
Reuse Solvent QA & QC Yes No Yes No		Rep Initials			Shipping Declaration:					
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Used solvent has no unusual odor Parts Cleaner is clean (front/back)	Lid is unobst	tructed er ja properly gro	ounde	d i	Transporter Information;			A	gnated Facility	, i.e.
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Authorization Signature I agree to pay for the above services and/or products and to be bound	hy the torms an	d conditions set !	forth at	hove	South Bend, IN 46628	A EPAIDE INTOOOD 198			1235-4183 EN 30	1
and on the reverse side of this document.	111		(9-1-05	EMERGENCY CONTACT CHEM	NEC (800) 424-9300		// Y/ Y 3 14(5/2)	The A house entered	11/2
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A Siemens Business US PELTER RECOVERY SERVICES (MID-ATLANTIC), SIG. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032		· / .		a alama	A SAME, A	riginal de la companya de la company	• • • · · · · · · · · · · · · · · · · ·	MBER 1425937
1-800-235-0109 CUSTOMER CONTACT PHARCUS DARDNER PHONE NUMBER 813-238-4111 SITE NUMBER NAME AND ADDRESS 36351406	,					FI	2-2-34 Pr	PAGE 1 OF 1 LL PROBLEM ORDER ORIGIN F.M PRIORITY 11
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Reuse Qualification Statement By signing this document, I hereby certify that I understand the used US F	itter degr	easing fluid (i.e	Mine	ral spirits.	atial II Conditionally Exempt a defined in 40 CFR 261.5 sitial II Do-It-yourself collection	on center	EF	nerator A ID#
perceioum naphilis) relumed to US Fator for inclusion in the US Fator Heads substitute for chemical product. For the purpose of qualifying to participate in tegrosaring fluid so returned to US Fater has not been mused with hazardous we All constituents that may be present in the degressing fluid are contaminants in of the solvent as a degresser or cleaner. I have reviewed our physical facilities procedures and based on this review do willing make this true, accurate and configurate Solvent QA & QC Yes No Used solvent passed visual inspection Lies of externity has no unusual odor.	s Program se or oth sulting fri , adminis mplete ce ght asse d is une d is une terms i	un, I further cert er objectionable man and incident traine practices ritication. Rep Initials mbly is in good satructed inner is properly and conditions is	work groun	any used nees. CFR 761 and ormal use perational including, but that to the be shipping D need of the condition of the conditi	ATOR hereby certifies that the it is not hazardous waste or bee defined in 40 CFR part 279, in the rebuttable waste presumplif not limited to, proper disposal sat of my knowledge, the informacient from the above-named main according to the applicable reignsport, inc. But 100 Per 100 P	material collected from the GENI on mixed with a listed or characte or GENERATOR certifies that the ston under 40 CFR Part 279 has it testing, and transportation if the mation presented herein is correc- sterials are properly classified, de igulations of the Department of Tri US DOT ID#: 828559 EPA ID#: INFI000022798 iii) 424-8300	ERATOR'S facility by US Falteristic hazardous waste as deli- stotal halogon content is less been rebutted. The GENER imaterial contains PCB's or is and accurate, and I am avit secreted, packaged, marked is ansportation. Described, packaged, marked is ansportation. Described, packaged, marked is ansportation.	or does not contain any PCB's as defined in the in 40 CFR 261, if the material collecte than 1,000 ppm, or the GENERATOR her ATOR will be responsible for any and all or a determined to be a hazardous waste. I ce nonzed to sign on bohalf of the GENERATI and labeled, and are in proper condition in the injuriated Eacility. South Alexander Street int City, FL 33563 of 235-0189, Ext 3 a 10#: FL00es690813
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USFilter	/dus	, si	PECIAL NOTES	i	SERV	ICE ORDER
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Reuse Qualification Statement By signing this document, I heroby certify that I understand the used US petroleum naphthal roturned to US Filter for inclusion in the US Filter Rel substitute for chemical product. For the purpose of qualifying to participate it degreesing fluid so returned to US Filter has not been mused with hazardous I All constituents that may be present in the degreesing fluid are contaminants of the solvent as a degreeser or cleaner. I have reviewed our physical facility procedures and based on this review do willing make this true, accurate and in Reuse Solvent QA & QC Yes No	the Program, I further of vaste or other objectional resulting from, and incides, administrative practic	setify that any used ble substances entit to, numai use ses, and operational	as defined in 40 CFR 26 Initial if Do-ft-yourself co. The CENERATOR horoby cortines the CFR 761 and is not hazardous waste a used oil as defined in 40 CFR part 2 certifies that the robuttable waste pre-including, but not limited to, proper distribute to the best of my knowledge, the	liection center is the material collected from the GEN or been mixed with a listed or charact 79, the GENERATOR certifies that th sumption under 40 CFR Part 279 hat posal, testing, and transportation if the information presented herein is corre- ation of the property classified, of a materials are property classified, of	EPATOR'S faculity by US Filto ensuc hazardous waste as def- te total halogon content is less a been rebutted. The GENERA e matenal contains PCB's or it ct and accurate, and I am auth lescribed, packaged, marked is	pnerator A ID# or does not contain any PCB's as defined intended in 40 CFR 261. If the material collection than 1,000 ppm, or the GENERATOR he ATOR will be responsible for any and all of determined to be a hazardous waste. I cohonzed to sign on behalf of the GENERAT and labeled, and are in proper condition in
Used solvent has no unusual odor Paris Cleaner is clean (front/back) Fusible link operational Authorization Signature Lagree to pay for the above sorvices and/or products and to be bound by and on the feybrae side of this document.	Lid is unobstructed Parts Cleaner is prope the terrils and condition	ity grounded is set forth above ()	Transporter Information: US Fiter Transport, Inc. 1857 Commerce Dr., Suite 108 South Bend, IN 46628 EMERGENCY CONTAGT CHEMPRE	US DOT ID#. 828559 EPA ID#: INF000022798	Des 105 Plar	eignated Facility South Alexander Street in July 1, 193563 of 235-0189, Ext 3 in July 1, FLD0a5980613 f PLANT DATE
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USFiler			!	SPEC	CIAL NOTES Kd	by Lab.	SER	VICE ORD	ER'
A Siemens Business us PLTER RECOVERY SERVICES (MO-ATLANTIC), INC. 14950 Healthrow Forest Pkwy, 250, Houston, TX 77032			.; .	Section 1	in the first		· N	UMBER	*
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Reuse Qualification Statement				,	Initial If Conditionally Exer	npl Small Quantity Generator	Ge	nerator ~	
By signing this document, I hereby certify that I understand the use patroleum naphthal returned to US Filter for inclusion in the US Filte substitute for chemical product. For the purpose of qualifying to particip	r Reuse Program	will be utakzed as	s an effe	ective	as defined in 40 CFH 281Initial if Do-it-yourself colle The GENERATOR hereby certifies that it	iction center	EP	A ID#	a defined in 40
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of the solvent as a degresser or cleaner. I have reviewed our physical procedures and based on this review do willing make this true, accurate	facilities, administr and complete cert	ative practices, ar dication.	nd operat	tional	certifies that the rebuttable waste presui including, but not limited to, proper dispo- that to the best of my knowledge, the inf	in notatrograph and transportation if	the material contains PCB's or is	determined to be a hazardous	weale Lough
Reuse Solvent QA & QC Yes No Yes No		Rep Initials	nd last o	n ·	Shipping Declaration: This is to certify that the above-named	meterials are properly classified,	described, packaged, marked a	-	
Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back)	· Lid is unobs				fransportation according to the applicable Transportar information: US filter Transport, Inc.	regulations of the Department of	Desi	gnated Facility	1
Fusible link operational Authorization Signature				*		US DOT ID#: 828559 'EPA ID#: INR000022798	Plan	South Alexander Street 1 City, FL 33563) 235-0169, Ext 3	
I agree to pay for the etione services and/or products and to be boun and on the priverse side of this document.	nd by the terms ar	id conditions set f	lorih abo	≫ d	EMERGENCY CONTACT CHEMTRES	(800) 424-0200 735		ID#: FLD065680613	
PHINT CUSTOMER NAME	CUSTO	MER SIGNATUR	E / C	DATE	DRIVER SIGNATURE A P	ATE	RECEIVED AT	PLANT / DATE	
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A Siemens Business

US PILTER RECOVERY SERVICES (MO-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 770321

1-800-235-0189

CUSTOMER CONTACT

MARCUS CARDHER

PHONE NUMBER

813-238-4111

SITE NUMBER NAME AND ADDRESS

56351406

TAMPA

TECO-EAST SLIGH

TRANSFORMER SHOP

2200 S SLIGH AVENUE

SERVICE ORDER

NUMBER 1468684

PAGE

CALL PROBLEM ORDER TYPE CODE ORIGIN

EIM

F.H

PRIORITY 111

P.O. NUMBER

CALL WAS TAKEN ON 07-23

SCHEDULED PM

PROBLEM SYNOPSIS, AS REPORTED

AT 0410 BY UPTM

49494-PLANT CITY DEFAU

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euse Qualification Statement r signing this document, I hereby certify that I understand	the used US File	t days	ssing Buid A.A.	Manu	Initial if Conditionally Exempt Small Quantity Ge	nerator		erator	

petroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse Program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the Program, I further certify that any used degressing fluid so returned to US Filter has not been mixed with hazardous waste or other objectionable substances. All constituents that may be present in the degressing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed out physical facilities, administrative practices, and operational procedures and based on this review do willing make this true, accurate and complete certification.

Reuse	Solvent	CA	4 00
Uense	SOIREIII	L	8 44

160	MO	
		Used solvent passed visual inspection
		. Used solvent has no unusual odor
		Parts Cleaner is clean (front/back)
		Fusible link operational

Yes No	Rep Initials
	Light assembly is in good working order
\cup \cup	Lid is unobstructed .
	Parts Cleaner is properly grounded

FL 33601

Authorization Signature

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

PRINT CUSTOMER NAME

July avers	10-5-0	5	900
CUSTOMER SIGNATURE /			

Initial if Conditionally Exempt Small Quantity	Generator .
as defined in 40 CFR 261.6	,
Instal # Do-H-vourself collection center	

UNKNOWN STATUS

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by US Filter does not contain any PC8's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used of as defined in 40 CFR part 279, the GENERATOR centries that the total halogen content is less than 1,000 ppm, or the GENERATOR hereby certiles that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR. Shipping Declaration:

The is to certify that the above-named meterials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information: US Fifter Transport, Inc.

1657 Commerce Dr., Surte 108 South Bend, IN 46628

US DOT ID#: 828559 - EPA ID#: INRO00022798

EMERGENCY CONTACT CHEMTREC (\$00)424-8300

Designated Facility 105 South Alexander Street Plant City, FL 33583 (800) 235-0189, Ext 3 EPA ID#: FLDUSSBUS13

DRIVER SIGNATURE 7

PLANT Y-DATE

14950 Heathrow Forest Pkwy, 250, Houston, TX 77032

US PILTER RECOVERY SERVICES IMO-ATLANTICL INC.

1-800-235-0182

SITE NUMBER NAME AND ADDRESS

TECO W GARAGE

5402 W GLIGH AVE

CUSTOMER CONTACT MARCUS GARDNER

813-228-1053

PHONE NUMBER

56351413

TAMPA

SPECIAL NOTES

60 - DAY GLERT

SERVICE ORDER

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1403372

ORDER ORIGIN

Fire

111

P.O. NUMBER

PRIORITY

ROUTE SEL COLSSIGNED TECH

-560004-FLANT CITY DEFAU

PROBLEM SYNOPSIS, AS REPORTED

ECHEDULED PM

CALL WAS TAKEN ON 10-07

M/A NUMBER

PROMISE DATE, TIME

MA0231222 10-13-05 VEHICLE NO. UPTIME UNIT NO. TRAILER NO. ARRIVE DATE ARRIVE TIME CLOSE DATE CLOSE TIME JOB COMPLETE SERIAL # # CONT PART / DESCRIPTION TYPE UM QUANTITY SHIPPING DESCRIPTION GLYCOL pH BRIX SNIFFER C-D-T COL-L'OAGA Cumbustible liquids n.o.s. (Petroleum Oil GA 1 HOU'D OTH ALTO BA 3. No. 1993, PETIT Reuse Qualification Statement

By signing this document, I hereby certify that I understand the used US Fifter degreesing fluid (i.e. Mineral spirits, petroleum naphtha) roturned to US Fifter for inclusion in the US Fifter Reuse Program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the Program, I further certify that any used degressing fluid so returned to US Filter has not been mixed with hazardous waste or other objectionable substances. All constituents that may be present in the degressing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do willing make this true, accurate and complete certification,

Rausa	Solvent	OA	4	OC

Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back) Fusible link operational	Light assembly is in good working order Lid is unobstructed Parts Cleaner is properly grounded	
Authorization Signature I agree to pay for the above services and/or products and to	he hound by the terms and anothers set forth above	
and on the reverse aide of this document.	1 221 7565 11.	15

CUSTOMER SIGNATURE / DATE

Rep Initials

Initial if Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.6

Initial # Do-It-yourself collection center

Generator

EPAID UNKHOWN STATUS

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by US Fifter does not contain any PC8's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used of as defined in 40 CFR part 279, the GENERATOR certifies that the lotal halogen content is less than 1,000 ppm, or the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR. Shipping Declaration:

This is to certify that the above-named meterials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter information: US Filter Transport, Inc.

1657 Commerce Dr., Bute 10B South Bend, IN 46628

US DOT ID#: 828559 EPA ID#: INFR000022798 EMERGENCY CONTACT CHEMTREC (800) 424-8300

105 South Alexander Street Plant City, FL 33583

(800) 235-0189, Ext 3 EPA ID#: FLD065680613

Designated Facility

DATE

445252

PRINT CUSTOMER NAME

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Reuse Qualification Statement By signing this document, I hereby certify that I understand the used US Figetroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse	iter degr	easing Buid (in will be ubliz	l.e. Mine	ral spirits,	Initial If Conditionally Exemples as defined in 40 CFR 281.5 Initial If Do-ti-yourself collections that the	tion center	E	PA ID#	BCB's as defined in A
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Authorization Signature 1 agree to pay for the above services and/or products and to be bound by the	i terme s	nd conditions	sel forth	above	South Bend, IN 46628	EPA 104: INH000022798	(80	20) 235-0189, Ext 3 PA IOF: FLD065680613	***
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Reuse Qualification Statement By signing this document, I hereby certify that I understand the used US Filter degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse Program will be utilized as an effective	Initial if Conditionally Exempt Small Quantity Generias defined in 40 CFR 261.5 Initial if Do-it-yourself collection center	ator		Generator EPA ID#	
petroleum naprina) returned to US Filter for inclusion in the US Filter Heuse Program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the Program, I further certify that any used degreasing fluid so returned to US Filter has not been mixed with hazardous waste or other objectionable substances.	The GENERATOR hereby certifies that the material collected from th CFR 761 and is not hazardous waste or been mixed with a listed or c				
All constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational	a used oil as defined in 40 CFR part 279, the GENERATOR certifies certifies that the rebuttable waste presumption under 40 CFR Part 2	that the to	otal halogen content is le een rebutted. The GENE	ess than 1,000 ppm, or ERATOR will be respon	the GENERATOR hereb sible for any and all cost
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Used solvent has no unusual odor	Transporter Information: US Filter Transport, Inc.			Designated Facility 05 South Alexander St	reet
Authorization Signature	1657 Commerce Dr., Suite 10B US DOT ID#: 828559 South Bend, IN 46628 EPA ID#: INR000022798		F	Plant City, FL 33563 800) 235-0189, Ext 3	
I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.	EMERGENCY CONTACT CHEMTREC (800) 424-9300			PA ID#: FLD06568061	13
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A Slemens Business Us FILTER RECOVERY SERVICES (MID-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032	The state of the s	NOTES FIZHTIZANCE	Price W	SEF	RVICO	DRDER
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1-800-235-0189 CUSTOMER CONTACT MARCUS GARDNER

SITE NUMBER NAME AND ADDRESS

TRANSFORMER SHOP

2200 S SLIGH AVENUE

TECO-EAST SLIGH

PHONE NUMBER 813-238-4111

56351406

US PILTER RECOVERY SERVICES PRO-ATLANTIC, SIC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032

ALERT

SERVICE ORDER

NUMBER	4 /101/1/1.4
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Fill PRIORITY

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P.O. NUMBER

501006 ROUTE

ASSIGNED TECH

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PROBLEM SYNOPSIS, AS REPORTED CCLEDIN EN EM

CALL WAS TAKEN ON 10-14

AT 0411 BY UF JM

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Reuse Qualification Statement By signing this document, I hereby certify that I underste petroleum naphtha) returned to US Filter for inclusion in I adultate for chemical product. For the purpose of qualifyir degressing fluid so returned to US Filter has not been mixed All constituents that may be present in the degressing fluid of the solvent as a degresser or cleaner. I have reviewed o procedures and based on this review do willing make this to the second se	he US Filter Reuse ig to participate in the with hazardous wast with contaminanta result physical facilities, ie, accurate and comp	Program Program Program or othe diling fro administ blete cer	will be utilized in, I further certifur objectionable in m, and incidenta rative practices, utication. Flep Initials _ inbly is in good	as an ly that substa il to, no and o	effective any used notes. primal use perational	The GENERAT CFR 761 and is a used of as of certifies that the including, but it that to the best Shipping Dec This to be certified.	s not hazardous waste or be- elined in 40 CFR part 279, the e rebuttable waste presump not limited to, proper disposal t of my knowledge, the infor- itaration: by that the above-named ma-	Same Service County Interest County (\$100 Service County Service C	tenstic hazardoui he total halogen o is been rebutted, he material contai ict and accurate, teacribed, nacker	ity by US Filter waste as definition to the second in thes	does not contined in 40 CFR. han 1,000 ppn IOR will be red determined to rized to sign o	tain any PCB 261, If the m m, or the GEI reponsible for be a hazard on behalf of E	STATE S's as defined in 4 naterial collected NERATOR hereby and all cost lous waste. I certitle GENERATOR
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US FILTER RECOVERY SERVICES (MID-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032

1-800-235-0189 CUSTOMER CONTACT

MARCUS GARDNER PHONE NUMBER

813-228-1053 SITE NUMBER NAME AND ADDRESS

56351413 TECO W GARAGE

5402 W SLIGH AVE

SPECIAL NOTES

CALL WAS TAKEN ON 11-18

SERVICE ORDER

NUMBER

1527334

ORIGIN F. 18

1. ORDER

BM

PRIORITY

111

P.O. NUMBER

TAMEA	FL	33601		PROBLEM SYNOPSIS, AS REPORTED SCHEDULED PM		← 56000 M/A NUMBER 0231222	PROM	CITY DEFAU MISE DATE, TIME 23-05
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ORIGINAL

Yes No Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back) Fusible link operational

Yes No Rep Initials Light assembly is in good working order Lid is unobstructed Parts Cleaner is properly grounded

CUSTOMER SIGNATURE / DATE

Authorization Signature

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

PRINT CUSTOMER NAME

446391

This is to certify that the above-named materials are properly classified, described, packaged, marked and labelec, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information: US Filter Transport, Inc.

1657 Commerce Dr., Suite 10B South Bend, IN 46628

US DOT ID#: 828559 EPA ID#: INR00002279

BY UPTM

AT 0424

EMERGENCY CONTACT CHEMTRED (800) 424-9300

DRIVER AUGUATURE

Designated Facility

105 South Alexander Street Plant City, FL 33563 (800) 236-0189, Est 3

EPA ID# FLD065680613

LF 070 Rev. B



August 8, 2006

TECO 2200 E. Sligh Avenue Tampa, FL 33610 Att: Luke DiRRuza

Ref: Oil Collection Schedule

Dear Luke,

This letter is to inform you that Siemens Hydrocarbons Services, formally USFilter Recovery Services, Inc. has adjusted your pick up schedule of used oils to a 14 day service interval for all stationary tanks containing used oil and the mobile tankers in the transfer area.

This has been discussed with your route driver and he will not have a problem in assisting you with your request for this.

Please feel free to call if you have any question, 813-754-1504 ext-3126

Sincerely,

Richard C. Mobley

Transportation Manager













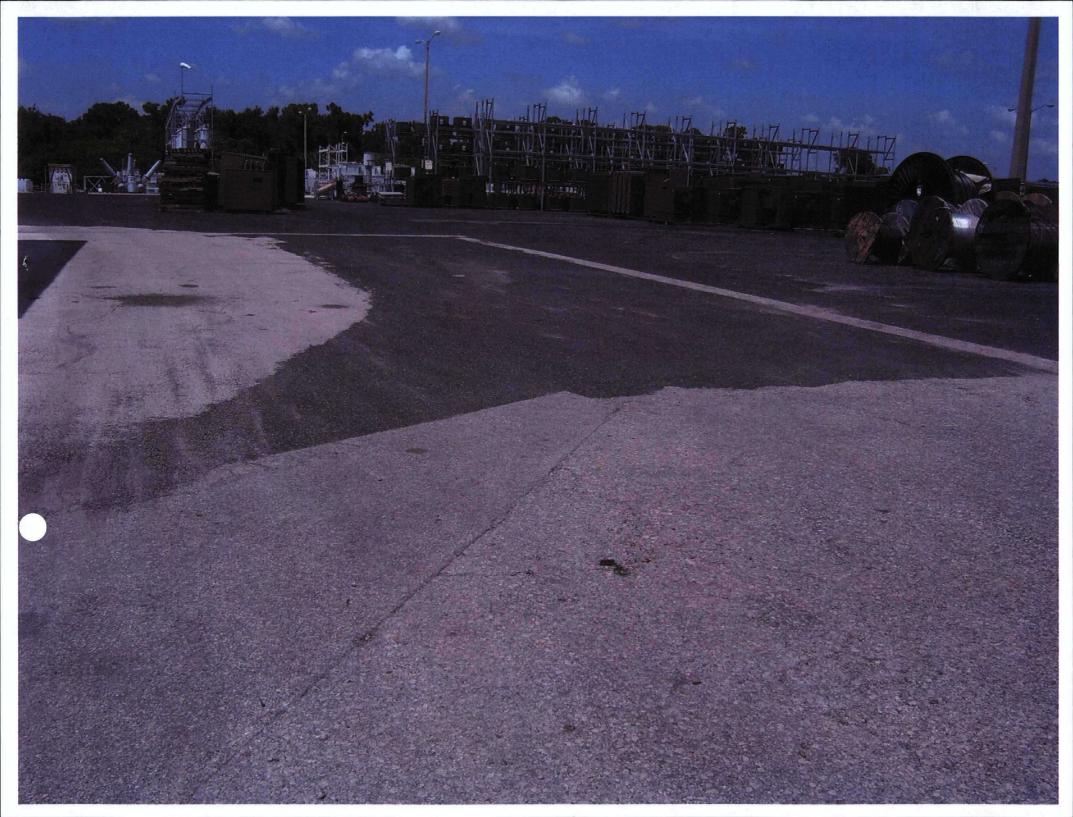


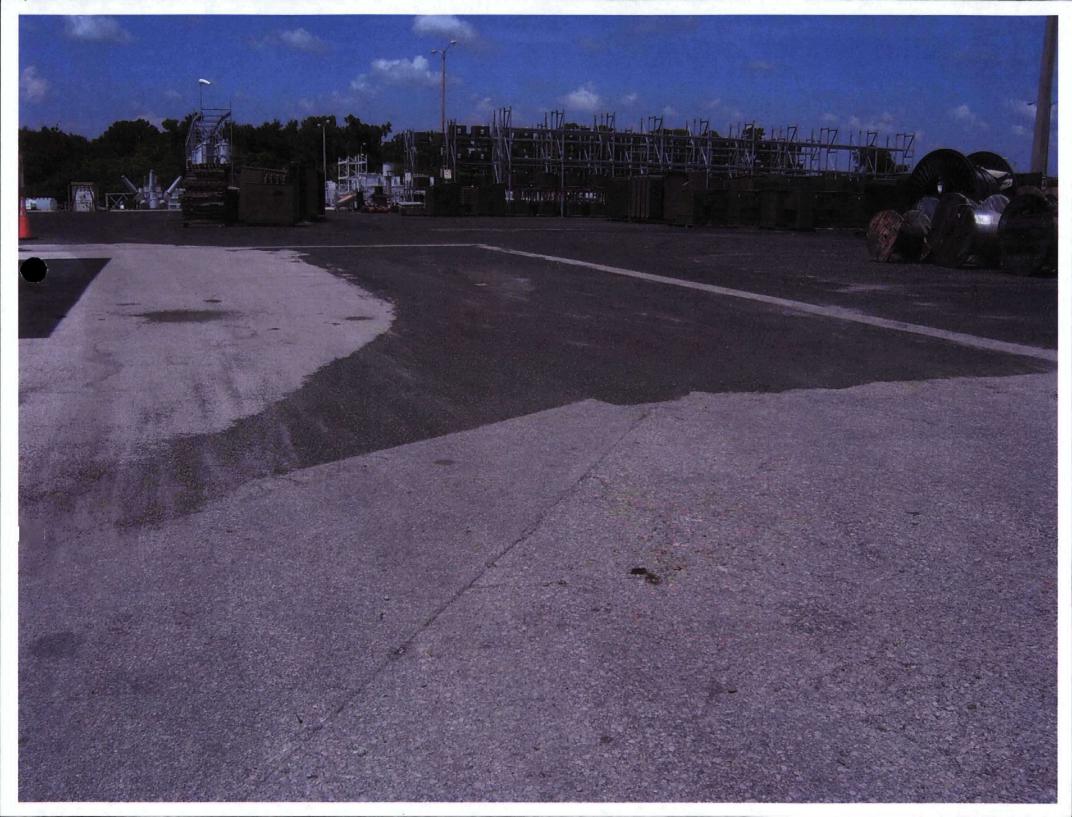




















ENERGY DELIVERY SAFETY, HEALTH and ENVIRONMENTAL MEMORANDUM

TO:

Cathy Dease

FROM:

Jim Cook

DATE:

March 21, 2006

SUBJECT:

Universal Waste Storage

We have had several meetings and conference calls trying to come up with a cost effective way to remedy the problems associated with storing our lamps and other Universal Waste. After yesterday's meeting with EHS we have came up with some solutions.

You will find listed below some of the solutions:

- Both the TEC and contract lighting crews will be responsible for placing spent lamps into sleeves, if the original sleeve is lost or damaged the crews will use bubble wrap to wrap the lamps to prevent breakage.
- The lighting crews will bring back the fixtures, lamps, capacitors, wire and etc. to the operations center and place each into its designated container for salvage or recycling.

Note:

The Manager at each operations center will be responsible for providing a covered area approximately 20' long or purchasing a three sided structure for the Universal Waste Containers.

Examples of containers that are required to be stored under a covered area out of the weather per FAC 62-737.400(7):

- 95 gallon yellow plastic over pack drums with lids for Non-Broken Lamps
- 55 gallon black plastic drums with lids for Broken Lamps
- 55 gallon black plastic drums with lids for Capacitors
- 55 gallon black plastic drums with lids for Photocells and Switches
- 55 gallon black plastic drums with lids for Mixed Batteries

Examples of containers that are not required to be placed under a covered area out of the weather:

- Wire baskets for lighting fixtures
- Pallets for wire and etc.

- 3. Stores employees will do the following:
 - Check the storage area on a routine basis to insure that the storage containers don't become over filled
 - Check to see that all lamps are in sleeves or wrapped, if not wrap the lamps or call Cathy Dease so that her employees can wrap the lamps prior to sending them to Investment Recovery at COC.
 - If Investment Recovery receives containers of lamps that aren't properly wrapped they will be returned to the operations center.

The following materials have been ordered:

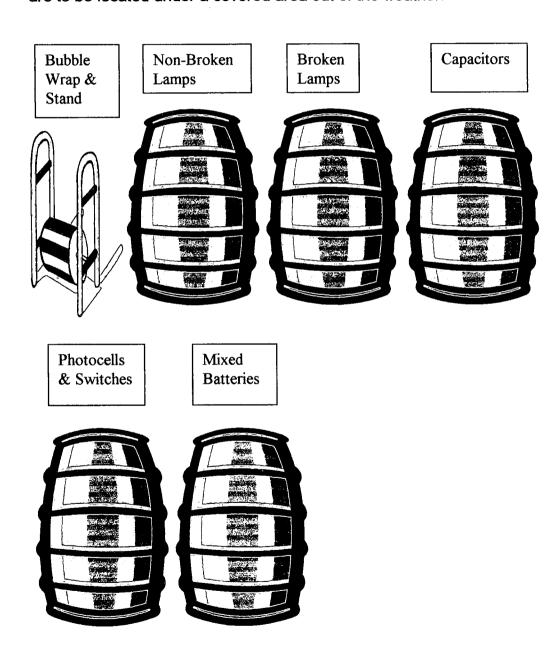
Stock Number	Materials	Remarks
5580001	Bubble Wrap 24" X 750" Roll	One roll will be located at each operations center next to the lamps for wrapping of the lamps to prevent breakage
5580003	Stand For Bubble Wrap 24" X 750" Roll	One roll will be located at each operations center
5580002	Bubble Wrap 12" X 12" 175 sheets per box	One box for each lighting truck for wrapping of the lamps to prevent breakage in the field
5580004	55-Gallon Plastic Drums With Lock Ring Lids	Three drums will be at each service area one for each of the following – Broken Lamps, Capacitors, Photocells and Switches Note: we may need additional backup drums
5580005	95-Gallon Yellow Over Pack Plastic Drums With Screw Type Lids	Two drums will be located at each operations center for Non-Broken Lamps Note: we may need additional backup drums
N/A	12 – 14 Inch Scissors	One pair for each of the bubble wrap stands for cutting the bubble wrap to proper size
N/A	1" Wide Masking Tape	One roll located at each of the bubble wrap stands for taping the wrap

50 each of the following labels have been ordered for the drums:

Signs	Description and Information
MERCURY CONTAINING BROKEN LAMPS	 Red label with white lettering MERCURY CONTAINING approximately 1" BROKEN – LAMPS approximately 2"
MERCURY CONTAINING NON-BROKEN LAMPS	Green label with white lettering MERCURY CONTAINING approximately 1" NON-BROKEN LAMPS

	approximately 2"
CAPACITORS	 Yellow label with Black lettering CAPACITORS approximately 2"
PHOTOCELLS & SWITCHES	White label with Black lettering CAPACITORS approximately 2"

You will see below a typical arrangement for the bubble wrap and the containers that are to be located under a covered area out of the weather:



Cathy as soon as the materials arrive we will be fast-tracking the implementation of the new requirements under the Universal Waste Rules, are you going to be communicating the changes to the Operations Centers Managers?

If you have any questions or need assistance please don't hesitate to give me a call ext. 36069 or my cell (813) 765-2579



Stores, Investment Recovery, & Tool Repair **Facility**

May 2006 Newsletter



Safety & Environmental

Tampa Electric has come up with a more cost effective way to properly dispose of its universal waste. Each Tampa Electric Operation Center is required to provide a covered universal waste storage area to properly process non-broken lamps, broken lamps, capacitors, photocells and switches, and mixed batteries. Each container is to be properly identified with the correct labels and they must be kept closed in accordance with FAC 62-7 37.400(7). For further information please contact the Energy Delivery Environmental Coordinator Jim Cook at extension #36069.

Celebrating May & June Service

<u>Anniversaries</u>	
Rodney Wetherington	May 2nd
Billy Chancey	May 8th
Michael Crowe	May 10th
Billy Price	May 14th
John Douty	May 19th
Robert Peterson	May 21st
Jim Gentry	June 1st
Scott Swoboda	June 4th
Linda Atkins	June 16th
Mario Herce	June 18th
Ricardo Rodriguez	June 30th

Celebrating May & June Birthdays

Bill Balogh	May 13th
Jim DeVane	May 24th
Mario Herce	June 2nd
Jim Rhodes	June 4th
Bo Madden	June 15th
Ronnie Rodriguez	June 20th



Safety Trivia Question

Abel Matos

Can you name the May 2006 Energy Delivery safety focus and theme? Hit: Its only (2) words. GroupWise your response to Willie Shoats prior to May 31st and win a special prize.

June 23rd

2006 Pick up Dates at COC by USFilter

	Used Oil/Gals.	Water/Gals.	Sludge/Gals.
01-06-06		270	340
01-06-06		700	500
01-10-06		50	
01-12-06	•	150	80
01-12-06		1600	300
01-17-06	2617	,	
01-17-06		900	
02-09-06	427		
02-13-06	2681		
02-13-06	4008		
03-02-06	175	75	
03-08-06	241		4
03-17-06	770		
03-17-06	3238		
03-17-06		600	50
03-20-06	712		
03-30-06	250		
04-04-06		600	200
04-05-06		250	
04-13-06	300		
04-17-06	712		
04-17-06	2754		
05-10-06 (Ar	ntifreeze)		
05-24-06	196	151	50
05-25-06	375		
06-01-06	1061		
06-09-06	3609		
06-22-06	1790		
06-26-06	500		
06-29-06		1400	400

US FILTER RECOVERY SPAVICES (MID-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032

CUSTOMER CONTACT

PHONE NUMBER

SITE NUMBER NAME AND ADDRESS 56351413 TECO GARAGES 5402 WSligh AVE TAMPA.F | 3364 SPECIAL NOTES

B. 11 To: JAMPA Electer P.O.BOX 3285 TAMPF1 33601 SERVICE ORDER

TYPE

PROBLEM CODE

ORDER

PRIORITY

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AT

BY

P.O. NUMBER

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Reuse Qualification	n Statement							nitial if Conditionally	Exempt	Small Quantity Genera	ator			Generator			

PROBLEM SYNOPSIS, AS REPORTED

y signing this document, I hereby certify that I understand the used US Filter degreasing fluid (i.e. Mineral spirits, etroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse Program will be utilized as an effective ubstitute for chemical product. For the purpose of qualifying to participate in the Program, I further certify that any used egreasing fluid so returned to US Filter has not been mixed with hazardous waste or other objectionable substances. ill constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational rocedures and based on this review do willing make this true, accurate and complete certification.

Yes No

Reuse Solvent QA & QC

65	140	
		Used solvent passed visual inspecti-
		Used solvent has no unusual odor
=		Parts Cleaner is clean (front/back)
ī	Ħ	Fusible link operational

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unionization	Signatur	C

agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

> INDS Trains PRINT CUSTOMER NAME

QUSTOMER SIGNATURE

Rep Initials

Parts Cleaner is properly grounded

Light assembly is in good working order

as defined in 40 CFR 261.5

Initial if Do-it-yourself collection center

EPA ID#

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by US Filter does not contain any PCB's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR. **Shipping Declaration:**

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information:

US Filter Transport, Inc.

1657 Commerce Dr., Suite 10B South Bend, IN 46628

US DOT ID#: 828559

EPA ID#: INR000022798

EMERGENCY CONTACT CHEMTREC (800) 424-9300

RIVER SIGNATURE / DATE

Designated Facility

105 South Alexander Street Plant City, FL 33563 (800) 235-0189, Ext 3

EPA ID#: FL0065680614

RECEIVED AT PLANT / DIATE

ORIGINAL

132858

Lid is unobstructed

LF 070 Rev. B

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SERVICE ORDER

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petroleum naphtha) returned to US Fitter for Inclusion in the US Fitter Reuse substitute for chemical product. For the purpose of qualifying to participate in the degressing fluid so returned to US Fitter has not been mixed with hazardous was A8 constituents that may be present in the degressing fluid are contaminants red of the solvent as a degresser or cleaner, I have reviewed our physical factioes, procedures and based on the review do willing make this true, accurate and com Reuse Solvent OA & OC Yes No Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back) Fusible link operational Authorization Signature I agree to pay for the above services and/or products and to be bound by the and on the reverse side of this document.	Program Progra	n wall be utilized in it. If the cert er objectionable orn, and incident orn, and incident trative practices, riffication. Rep Initials ambly le in good setructed oner is properly	working	The GENERATOR hereby certries that the material collected from the Genes. The GENERATOR hereby certries that the material collected from the Genes. In section of the certries that it is not hear around the selection of the certries that the rebuttable waste presumption under 40 CFR part 279 including, but not limited to, proper deposal, testing, and transportation if that to the best of my knowledge, the information presented herein is constituted in the certries that the above-named materials are properly clessified transportation according to the applicable regulations of the Department of Transportation according to the applicable regulations of the Department of US Firet Transport. Inc. 1057 Commerce Dr., Suite 108 South Bend, IN 46628 EMERGENCY CONTACT CHEMTREC (800) 424-8-300	acterial at the to has be if the m prect a i, deec	slic hazardoue w cial halogen cor sen rebutted. Th naterial contains and accurate, ar cribed, packages aportation,	y by US Fall vaste as do nieri is less he GENER s PCB's or i nd I am aut d, marked 103 Pla (80 EP)	er does not conti fined in 40 CFR is then 1,000 ppn ATOR will be re- is determined to horized to sign o	201. R the (sponsible to the character) to the character behalf of are in print (sponsible to the character) to the character behalf of the character	te material conscience GENERATOR here to any and all co ardous waste. I cer of the GENERATO proper condition for

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Reuse Qualification Statement By signing this document, I hereby certify that I understand the petroleum naphthal returned to US Fifter for inclusion in the U substitute for chemical product. For the purpose of qualifying to degressing fluid so returned to US Fifter has not been mixed with Al constituents that may be present in the degressing fluid are to of the solvent as a degresser or cleaner. I have reviewed our ph	JS Fifter Reuse I participate in the hazardous waste contaminants resu trisical facilities, a	Program Program Program or othe ulting from administra	m, I further certif or Objectionable i or, and incidente	as an y that ubstor	effective any used ces.	Initial if Conditionally Exemples as defined in 40 CFR 261.5 Initial if Do-H-yourself collect The GENERATOR hereby certales that the CFR 761 and is not hazardous waste or be a used oil as defined in 40 CFR part 279, if certifies that the rebuttable waste presump	on center material collected from the G en mixed with a listed or cher he GENERATOR certifies tha	ENERATOR'S facilit acteristic hazardous on it the total habone on	EP/ ty by US Filter waste as defin	ned in 40 CFR 261, ill ill	ne material collected
procedures and based on this review do willing make the true, so Reuse Solvent QA & QC Yes No Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back)	Yee No	d assen	Rep Initials _ hbly is in good intructed	workin	g order	including, but not limited to, proper disposal that to the best of my knowledge, the inform Shipping Declaration: This is to certify that the above-named ma transportation according to the applicable re Transporter information:	i, wating, and transportation i Nation presented herein is co Iterals are minority classified	i the material contain mect and accurate, a	a PCB's or is and I am authorist, marked an	determined to be a haz prized to sign on behalt ad labeled, and are in	zardous waste. I certificate of the GENERATOR
☐ Fusible link operational Authorization Signature Lagree to pay for the above services and/or products and to be and on the reverse side of the document.			er is properly g			US Filter Transport, Inc. 1657 Commerce Dr., Suite 108 U	IS DOT ID#: 828559 PA ID#: INFRO00022798 0) 424-8300	Anh.	103 S Plant (600)	anated Facility South Alexander Stree City, FL 33563 235-0182, Ext 3 ID#, FLD065680613	Clar
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A Siemens Business us ratta recovery services (wo at Lamic), sec. 14950 Healthrow Forest Pkwy, 250, Houston, TX 77032		60 - I		w.	ALE.	PECIAL NOTES R. T! R. & PURI	l l			RVICE O	RDER
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A Siemens Business us filter recovery services (mid-atlantic), inc.		60 - D	AY	A L E	R T !!			и	SE	RVICE (ORDER
14950 Heathrow Forest Pkwy, 250, Houston, TX 77032 1—800—235—0189 CUSTOMER CONTACT **IARCUS GARDNER PHONE NUMBER 3.13—228—1053 SITE NUMBER NAME AND ADDRESS 36351413 TECO W GARAGE 5402 W SLIGH AVE	v 1	PUMP L	CAI	LL WAS TAKEN		AT 1429	R-W	υτε 5 6 <i>l</i>		PAGE CALL PROBLETYPE CODE BI) PRI P.O. I NOME MEET	CC ORITY NUMBER NED
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PART / DESCRIPTION	U/M	QUANTITY	нм		SHIPPING	DESCRIPTION		01.4	SERIAL#	# CONT	TYPE
	GA	241	X Cum	bustible 3, NA,	e liquids 1993, PGI	nvois.(F	'etroleum C	GLY	COL p		VIFFER C-D-T
- No. 1		AN A						53			
							12.				(10) 10 10 10 10 10 10 10 10
					T. 8	20		+			
Used solvent has no unusual odor Lid is	e Program, e or other oulting from, administration of the certification	I further certify objectionable su, and incidental tive practices, a cation. Rep Initials, by is in good w	that any used ubstances. to, normal use and operational working order		Initial The GENERATO CFR 761 and is n a used oil as defit certifies that the r including, but not that to the best of Shipping Declar This is to certify the	if Do-it-yourself colle it hereby certifies that it of thazardous waste or te ed in 40 CFR part 279, subuttable waste presun imited to, proper dispos my knowledge, the info ation: nat the above-named rording to the applicable rmation: t, Inc. ir., Suite 10B	apt Small Quantity General collected from the material collected from the peen mixed with a listed or chunder the GENERATOR certifies pitting under 40 CFR Part 2; sal, testing, and transportation mation presented herein is naterials are properly classifications of the Departmen US DOT ID#: 828559	e GENERATOF naracteristic haz that the total ha 79 has been ret on if the material correct and acc	logen content in butted. The GE contains PCB' curate, and I an	S Filter does not contain a sax defined in 40 CFR 261 s less than 1,000 ppm, or NERATOR will be resports or is determined to be a n authorized to sign on be	If the material collected is the GENERATOR hereby asible for any and all costs hazardous waste. I certify shalf of the GENERATOR.

JS FILTER RECOVERY SERVICES (MID-ATLANTIC), INC.

14950 Heathrow Forest Pkwy, 250, Houston, TX 77032

L-800-235-0189

CUSTOMER CONTACT

MARCUS GARDNER

PHONE NUMBER

3137238-4111

SITE NUMBER NAME AND ADDRESS

56351406

TECO-EAST SLIGH

CRANSFORMER SHOP

220048 SLIGH AVENUE

33601

CALL WAS TAKEN ON 01-27

BY UPTM 0502

SERVICE ORDER

NUMBER 1597926

PAGE

CALL TYPE

PROBLEM CODE BM

PRIORITY 111

P.O. NUMBER

SSIGNED TECH PLANT CITY DEFAU

M/A NUMBER MACCOOM PROMISE DATE, TIME

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HOLORO TRAILER	NO. UPTIME	UNIT NO.	Q,	b	ST 1 6	3-17-6	ARRIVE TIME	CLOSE DATE	CLC CLC	DISE TIME	JOB COMPLETE YES NO
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3-OILB DIL PROCESSING F	REO BB/	GA.	1.					GLICOL	рп	BRIX SNI	FFER C-D-T
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COL-OWAGA DILY WATER AUTO	GA BB/	GA /	4	Non DOT R	egulated O	ily Water					
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use Qualification Statement signing this document, I hereby certify to	hat I understand the used US F	ilter degrea	asing fluid (i.e. Mine	aral enirite	Initia	I if Conditionally Exemp	t Small Quantity Generator		Gen	erator III.II.	731 III 1 7339 A 1911 .

PROBLEM SYNOPSIS, AS REPORTED

SCHEDULED PM

BEST AVAILABLE COPY SPECIAL NOTES

oleum naphtha) returned to US Filter for inclusion in the US Filter Reuse Program will be utilized as an effective stitute for chemical product. For the purpose of qualifying to participate in the Program, I further certify that any used reasing fluid so returned to US Filter has not been mixed with hazardous waste or other objectionable substances. constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use ne solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational bedures and based on this review do willing make this true, accurate and complete certification.

Yes No

use Solvent QA & QC

No	
	Used solvent passed visual inspection
	Used solvent has no unusual odor
	Parts Cleaner is clean (front/back)
	Fusible link operational

thorization Signature

ree to pay for the above services and/or products and to be bound by the terms and conditions set forth above on the reverse side of this document.

CUSTOMER SIGNATURE

Rep Initials

Parts Cleaner is properly grounded

Lid is unobstructed

Light assembly is in good working order

7 mar 06 DATE

ORIGINAL

as defined in 40 CFR 261.5 Initial if Do-it-yourself collection center

EPA ID#

UNKNOWN STATUS

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by US Filter does not contain any PCB's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR. Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information:

US Filter Transport, Inc. 1657 Commerce Dr., Suite 10B South Bend, IN 46628

US DOT ID#: 828559 EPA ID#: INR000022798

EMERGENCY CONTACT CHE

DRIVER SIGNATURE

Designated Facility 105 South Alexander Street Plant City, FL 33563 (800) 235-0189, Ext 3

EPA ID#: FLD065680613

423250

USFILE! A Siemens Business	f ₃	<i>;</i>		. s	PECIAL NOTES		SER	VICE O	RDER
14950 Heathrow Forest Pkwy, 250, Houston, TX 7703; CUSTOMER CONTACT	2 (N)	-					10	PAGE C	COF
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TAMPA, FI.			<u>.</u>	PROBLEM SYNO	PSIS, AS REPORTED	ROUTE	ASSIGN WA NUMBER	PROMISE DA	4201 TE, TIME
96119.2 TRAILER NO.	569		2.	0 50	1.0 3-12-C			OSE TIME	JOB COMPLETE
PART/DESCRIPTION	U	-	r нм.		SHIPPING DESCRIPTION		SERIAL # GLYCOL pH	BRIX SNIFF	TYPE ER C-D-T
MACUNE SEPVICE CHAPGE MI-EGCLN EDUIPNIENT CLERKING		1 1							
COL - STUDGE GA		A 600		MEN DOT ZE	a laterioren ell	און וישל זען			
Slung Saling	RA	50	+						7
Reuse Qualification Statement By signing the occurrent, I horoby certify that I universitand the By signing the occurrent, I horoby certify that I universitand the permeter analysis of the substitute for chemical product. For the purpose of qualifying to part degreesing fluid so returned to US Filter has not been mixed with hat All contituents that may be present in the degreesing fluid are control of the solvent as a degreeser or cleaner, I have reviewed our physic procedures and based on the tennes do willing make the true, accurrence to the solvent As a degreeser or cleaner, I have reviewed our physic procedures and based on the tennes do willing make the true, accurrence to Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (tront/back) Fusible link operational Authorization Signature lagree to pay for the above services and/or products and to be being on the reverse aids of this document. PRINT CUSTOMER NAME 437084	Filter Reuse Progr ticipate in the Progradous waste or d aminanta resulting cal facilities, admir- nate and complete of the No Light aus Lid is urn Parts Cle	um will be utilized year. I further cent ther objectionable from, and incident istrative practices, pertification. Rep Initials embly is in good obstructed anner is property	d es en try that i substar tal to, no i, and op worken ground	effective any used ices, irrial use erational gorder ed above		on center material collected from the GENE in mised with a listed or character ie GENERATOR centries that the both betting, and transportation if the insting, and transportation if the insting presented herein is correct tends are properly classified, des guistons of the Department of Trai is DOT ID#, 828559 PA ID#, INROD0022798 b) 424-8300	RATOR'S facility by US Fifte testic hazardous waste as definitional halogen contant is less seen rebutted. The GENERA mellerial contains PCB's of its and accurate, and I am authoritied, packaged, marked an apportation. Deal 105: Plant (900) EPA	ned in 40 CFR 261. If the than 1,000 ppm, or the i TOR will be responsible determined to be a hazz orized to sign on behalf	e malerial collected is GENERATOR hereby is for any and all costs ardous waste I certify of the GENERATOR. Proper condition for

SPECIAL NOTES

SERVICE ORDEF

US FILTE	R RECOVERY S	ERVICES MID-AT	LANTIC), INC.		
14950	Heathew	S est Pkwy	250, Houston	, TX	77032

1-800-155-01 CUSTOMER CONTACT

MCCLOUX RALPH

PHONE NUMBER

813-275-3182

SITE NUMBER NAME AND ADDRESS

58822201

TAMPA

2200 E SLIGH AVE

TECO SUBSTATION

OK TO PICK UP PER KELLI KEEP SEGREATED ON BOTH TRUCK AND ONCE IT GETS TO FACILITY BW

NUMBER 1662858

PAGE

CALL **PROBLEM** CODE

BD

ORDER

ORIGIN

CC

PRIORITY

CALL WAS TAKEN ON OB-29

PROBLEM SYNOPSIS. AS REPORTED

AT 1505 BY WIXO

P.O. NUMBER SCIONO MONE NEEDED

ASSIGNED TECH

HOOOG FLANT CITY DEFAU

M/A NUMBER

PROMISE DATE, TIME

MA0318487

03-29-06

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COL-UOIGA	GA	- 1	Х	Combustible	Liquid	s n.o.s.(Pe	troleum Oil				1	7	,
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Reuse Qualification Statement By signing this document, I hereby certify that I understand the used US Filte petroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse I	Program	will be utilized	as an	effective	<u>re</u> as	itial if Conditionally Exempt defined in 40 CFR 261.5 itial if Do-it-yourself collection	on center			Generator EPA ID#			
substitute for chemical product. For the purpose of qualifying to participate in the degreasing fluid so returned to US Filter has not been mixed with hazardous waste All constituents that may be present in the degreasing fluid are contaminants result of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, and procedures and based on this review do willing make this true propulsed and come.	Program e or other ulting from administra	 I further certify objectionable so and incidental ative practices, a 	that ubstar	any used nces. ormal use	CFR 761 and a used oil as o certifies that the	ATOR hereby certifies that the is not hazardous waste or bee defined in 40 CFR part 279, the rebuttable waste presumpt and lighted to proport disposal.	n mixed with a listed or charac e GENERATOR certifies that t ion under 40 CFR Part 279 ha	teristic hazardous he total halogen c as been rebutted.	waste as content is le The GENE	defined in 40 CFR less than 1,000 ppn ERATOR will be res	261. If the n, or the (sponsible	e materi GENER/ e for any	ial coll ATOR and a

Reuse Solvent QA & QC

Yes No Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back) Fusible link operational

Yes No Rep Initials Light assembly is in good working order Lid is unobstructed Parts Cleaner is properly grounded

33610-1334

Authorization Signature

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above

and on the reverse side of this document.

INT CUSTOMER NAME

163320

ORIGINAL

sal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I ϵ that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERA Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition transportation according to the applicable regulations of the Department of Transportation.

Transporter Information: US Filter Transport, Inc.

1657 Commerce Dr., Suite 10B

US DOT ID#: 828559

South Bend, IN 46628 EMERGENCY CONTAC

Designated Facility 105 South Alexander Street Plant City, FL 33563

(800) 235-0189, Ext 3

LF 070 Rev

USFIECE A Siemens Business				SPEC	CIAL NOTES	80 s			S	ER۱	/ICE O	RD)ER
us Filter Recovery Services (MID-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032		4								NL	JMBER \5	15	589
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signing this document, I hereby certify that I understand the used US Fi roleum naphtha) returned to US Filter for inclusion in the US Filter Reuse	Progran	boxility od Iliw	an an af	factive	as de	if Conditionally Exe ined in 40 CFR 261 if Do-it-yourself colle	mpt Small Quantity Ge	nerator		Gen	nerator		
stitute for chemical product. For the purpose of qualifying to participate in th reasing fluid so returned to US Filter has not been mixed with hazardous was constituents that may be present in the degreasing fluid are contaminants res he solvent as a degreaser or cleaner. I have reviewed our physical facilities, cedures and based on this review do willing make this true, accurate and com-	e Progra te or oth sulting fro administ	m, I further certifer objectionable som, and incidental trative practices	y that any substance	y used is.	The GENERATOR CFR 761 and is not a used oil as defir certifies that the r including, but not	R hereby certifies that of hazardous waste or led in 40 CFR part 27! buttable waste presu imited to, proper dispo-	the material collected from the mixed with a listed 9, the GENERATOR certiumption under 40 CFR Page 20 and transpoors.	or character ifies that the art 279 has l	istic hazardous wa total halogen cont been rebutted. The	by US Filter aste as defin ent is less the GENERAT	does not contain any ned in 40 CFR 261. If han 1,000 ppm, or th TOR will be responsit	the mater ne GENER ible for any	rial collected is RATOR hereby y and all costs
ruse Solvent QA & QC		Rep Initials _			Shipping Declar	ation:	normation presented here	ein is correct	and accurate, and	am autho	rized to sign on beha	alf of the G	GENERATOR.
Used solvent has no unusual odor Parts Cleaner is clean (front/back) Pausible link operational	is unob	mbly is in good wastructed ner is properly g			transportation acc Transporter Info US Filter Transport 1657 Commerce I	rmation: t, Inc.	materials are properly of e regulations of the Depar	assified, des	cribed, packaged, nsportation.	Desig 105 S	anated Facility South Alexander Stre		ondition for
nthorization Signature gree to pay for the above services and/or products and to be bound by the if on the raye se side of this dodument.	terms a	nd conditions set	t forth ab	ove	South Bend, IN 46		US DOT ID#: 828559 EPA ID#: INR00002279 (800) 424-9300_	98	Pnin	(B00)	City, FL 33563 235-0189, Ext 3 D#: FLD065680613		- 0
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14950 Heathrow Forest Pkwy, 250, Houston, TX 77032			**	,	1(0	UMBER	1
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CHANCH

PRINT CUSTOMER NAME

463238

CUSTOMER SIGNATURE / DATE

A Siemens Business US PLTER RECOVERY SERVICES (MID-ATLANTIC), SVC.				UE+. 2	SPECIAL NOTES	peraton/	DRAIN		SER	VICE C	RDER
14950 Heathrow Forest Pkwy, 250, Houston, TX 77032					1. F.11)(0	SSS (c07
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Reuse Qualification Statement By signing this document, I hereby certify that I understand the	used US Filter de	gressing fluid	(i.e. Mine	ral spirits,	. as	tial if Conditionally Exempt defined in 40 CFR 261.5 tial if Do-it-yourself collection	Small Quantity Generate	x		enerator PA ID#	
petroleum naphtha) returned to US Filter for inclusion in the US substitute for chemical product. For the purpose of qualifying to pay degreasing fluid so returned to US Filter has not been mixed with ha	ricipale in the Prop	yam, I further o	certify that	any used	The GENERA	TOR hereby certifies that the is not hazardous waste or bee	material collected from the	GENERA	TOP'S lacility by HIS Edit	nt does not continue as	y PCB's as defined in
All constituents that may be present in the degreesing fluid are control the solvent as a degreeser or cleaner. I have reviewed our physic	laminants resulting	from, and incid	dental to, n	ormal use	a used on as o	delined in 40 CFR part 279, the rebuttable waste presumpt	e GENERATOR certifies th	at the lote	il halogen content is lesi	than 1,000 pom, or t	he GENERATOR here
procedures and based on this review do willing make this true, accur Reuse Solvent QA & QC	rate and complete	pertheation.			Including, but	not limited to, proper disposal, it of my knowledge, the inform	testing, and transportation	# the ma!	enal contains PCB's or i	a delearnmed to be a f	atardous waste I cart
Annual Property of the Control of th	es No	Rep Initia		no ories	This is to cert	claration: ify that the above-named mai	enale are properly classifier	d, describ	ed, packaged, marked		
Used solvent has no unusual odor Parts Cleaner is clean (front/back)	Lid is un	obstructed laner is prope			Transporter		guistions of the Department	of Transpo		ignated Facility	
Authorization Signature					US Filter Tran 1857 Certimer South Bend, II	ce Dr., Suite 10B . U	S DOT ID#: 828559		Pla	South Alexander Str nl City, FL 33563	set
I agree to pay for the above services and/or products and to be b and on the reverse aids of this document.	ound by the terms	and condition	set forth	100±11 92		CONTACT CHEMTREC (800	PA ID#: INR000022798 I) 424-9300			0) 235-0189, Ext 3 : A ID#: FLD06568061:	3
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A Siemens Business US FILTER RECOVERY SERVICES (MID-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 7703		lo Lo	CATION OSCIOLON		SER	VICE ORD	DER JO
1-800-238-0 189 CUSTOMER CONTACT PHONE NUMBER			JoB	F-1-30	(10		F ORDER ORIGIN
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PART / DESCRIPTION	U/M QUANTIT	Y HM	SHIPPING DESCRIPTION	NOSNAI9938	SERIAL# GLYCOL pH	# CONT BRIX SNIFFER	C-D-T
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	articipate in the Program, I further ce inazardous waste or other objectionabl ntaminants resulting from, and incider sical facilities, administrative practice urate and complete certification. Yes No Light assembly is in goo Lid is unobstructed	ortify that any used te substances. Intal to, normal use as, and operational s ad working order	as defined in 40 CFR; Initial if Do-it-yourself of The GENERATOR hereby certifies t CFR 761 and is not hazardous wast a used oil as defined in 40 CFR parcertifies that the rebuttable waste princluding, but not limited to, proper of that to the best of my knowledge, the Shipping Declaration: This is to certify that the above-nan	Exempt Small Quantity Generator 261.5 collection center that the material collected from the GENI to or been mixed with a listed or characte the 279, the GENERATOR certifies that the resumption under 40 CFR Part 279 has disposal, testing, and transportation if the information presented herein is corrected med materials are properly classified, decable regulations of the Department of Transportment of Transportm	ERATOR'S facility by US Filt pristic hazardous waste as de e total halogen content is les been rebutted. The GENER material contains PCB's or at and accurate, and I am aut pscribed, packaged, marked ansportation.	efined in 40 CFR 261. If the mate is than 1,000 ppm, or the GENEF ATOR will be responsible for an is determined to be a hazardous thorized to sign on behalf of the (erial collected i RATOR hereb ny and all cost s waste. I certif GENERATOF
Parts Cleaner is clean (front/back) Fusible link operational Authorization Signature agree to pay for the above services and/or products and on the reverse side of this document.		1	US Filter Transport, Inc. 1657 Commerce Dr., Suite 10B South Bend, IN 46628 EMERGENCY CONJACT CHEMTE	US DOT ID#: 828559 EPA ID#: INR000022798 369 (800) 424-9300	105 Pla (80	5 South Alexander Street ant City, FL 33563 0) 235-0189, Ex 3 'A ID#: FLD065660613	
PRINT CUSTOMER NAME	CUSTOMER SIGNA	TURE / DATE ORIG	DRIVER SIGNATURE	DATE	RECEIVED AT	PLANT / DATE	079 Rev. B
TO 1 000							-

		BEST AVAILABLE COPY		
A Siemens Business us filter recovery services (MID-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77	60 – D 6	SPECIAL NOTES	SI	ERVICE ORDER
1-800-235-0189 customer contact MARCUS GARDNER		CALL WAS TAKEN ON 03-24 AT 0501	R-2-304 BY UPTM ROUTE SCIONA	PAGE 1 OF 1 CALL PROBLEM ORDER ORIGIN EM PRIORITY M11 P.O. NUMBER ASSIGNED TECH
TAIP TAILER NO.	FL. 33601	PROBLEM SYNOPSIS, AS REPORTED SCHEDULED FM	#A0004 M/A NUMBER MA0227663	► PLANT CITY DEFAU PROMISE DATE, TIME 03-31-06
361099	SECTION TO	TM 17 ST ARRIVE DATE	ARRIVE TIME CLOSE DATE 9718 4.7.4	CLOSE TIME JOB COMPLETE NO
PART / DESCRIPTION	U/M QUANTITY HM	SHIPPING DESCRIPTION	SERIAL #	" OSI(1 111E
B-OTLB OTL PROCESSING REQ COL-UOAGA USED OTL AUTO GA	BB/ GA 1	Combustible liquids n.o.s.(F		pH BRIX SNIFFER C-D-T
COL-OWAGA OILY WATER AUTO GA	BB/ GA 2754 BB/), 3, MA, 1993, PGIII Non DOT Regulated Oily Water		
		III.		V. J.
No.				
signing this document, I hereby certify that I understand the roleum naphthal returned to US Filter for inclusion in the Us stitute for chemical product. For the purpose of qualifying to greasing fluid so returned to US Filter has not been mixed with constituents that may be present in the degreasing fluid are on the solvent as a degreaser or cleaner. I have reviewed our phe cedures and based on this review do willing make this true, actives Solvent OA & OC.	os Filler Reuse Program will be utilized as an p participate in the Program, I further certify that a h hazardous waste or other objectionable substan contaminants resulting from, and incidental to, no bysical fedition, admissionables.	effective	pt Small Quantity Generator Stition center The material collected from the GENERATOR'S facility by the material collected from the GENERATOR'S facility by the mixed with a listed or characteristic hazardous waste the GENERATOR certifies that the total halogen content potion under 40 CFR Part 279 has been rebutted. The Getal, testing, and transportation if the material contains PC	te as defined in 40 OFH 261. If the material collected is not is less than 1,000 ppm, or the GENERATOR hereby

3 No Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back) Fusible link operational

Yes No Rep Initials Light assembly is in good working order Lid is unobstructed Parts Cleaner is properly grounded

thorization Signature

ree to pay for the above services and/or products and to be bound by the terms and conditions ser forth above on the reverse side of this document.

PRINT CUSTOMER NAME

463079

CUSTOMER SIGNATURE / DATE

40 eby that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information: US Filter Transport, Inc.

1657 Commerce Dr., Suite 10B South Bend, IN 46628

US DOT ID#: 828559 EPA ID#: INR000022798

EMERGENCY CONTACT

Designated Facility 105 South Alexander Street Plant City, FL 33563

(800) 235-0189, Ext 3 EPA ID#: FLD06568061;

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A Siemens Business us filter recovery services (MID-ATLANTIC), INC.			60	D A		PECIAL NOTES E R' T' !	!!			SEF	RVICE	OR	DER
14950 Heathrow Forest Pkwy, 250, Houston, TX 77032 1-800-235-0189 CUSTOMER CONTACT MARCUS GARDNER PHONE NUMBER 813-228-1053 SITE NUMBER NAME AND ADDRESS 56351413	2	,	Need Alrea	ds dy	DRUM AND TOBE Talked	Pumpeu 170 S	ks 1 Oud TEVE				TYPE CO		9439 OF 1 ORDER ORIGIN CC
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signing this document, I hereby certify that I understand the user of leum naphthal returned to US Filter for inclusion in the US Fisher for chemical product. For the purpose of qualifying to part greasing fluid so returned to US Filter has not been mixed with haz constituents that may be present in the degreasing fluid are contained to solvent as a degreaser or cleaner. I have reviewed our physic cedures and based on this review do willing make this true, accurate the solvent as a degreaser or cleaner. I have reviewed our physic cedures and based on this review do willing make this true, accurate the solvent QA & QC is No	iller Heuse Ficipate in the cardous waste uninants resu cal facilities, a cate and comp	Program Progra	will be utilized ,, I further certifi objectionable s n, and incidental ative practices, fication. Rep Initials _ bly is in good v tructed er is properly g	as an effecti y that any us substances. I to, normal u and operation working order grounded	ve ed se nal	as de Initial The GENERATO CFR 761 and is n a used oil as defir certifies that the reincluding, but not that to the best of Shipping Declar This is to certify transportation acc. Transporter Info US Filter Transport 1657 Commerce I South Bend, IN 44 EMERGENCY COMMERCE SOUTH	ined in 40 CFR if Do-it-yourself if Do-it-yourself if To-it-yourself in the Indiana waste and in 40 CFR par ebuttable waste pulimited to, proper comy knowledge, that the above-narording to the applicing to the applicing the Inc. 7, Inc. 70-7, Suite 10B	Exempt Small Quantity Generate 261.5 collection center collection center that the material collected from the te or been mixed with a listed or chain 1279, the GENERATOR certifies the resumption under 40 CFR Part 279 disposal, testing, and transportation le information presented herein is commed materials are properly classifier cable regulations of the Department US DOT ID#: 828559 EPA ID#: INR000022798 IEC (800) 424-9300	GENERATOR'S factoristic hazardou at the total halogen has been rebutted if the material contactorrect and accurate d, described, packa of Transportation.	illity by US F is waste as o content is le The GENE ins PCB's o , and I am ai ged, marked 10 PI (8	EPA ID# EPA	tain any PCB 261. If the mm, or the GEI sponsible for be a hazardo on behalf of the d are in prop ty ier Street 33 41 3 880613	naterial collected is INERATOR hereby or any and all costs lous waste. I certificate the GENERATOR per condition for
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	USFIECE A Siemens Business	,			SPE	CIAL NOTES				SER'	VICE O	RDER
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1	Reuse Qualification Statement					Initia	al if Conditionally Exempt	Small Quantity Generate			nerator	
	By signing this document, I hereby certify that I understand the petroleum naphtha) returned to US Filter for inclusion in the US substitute for chemical product. For the purpose of qualifying to pudegreasing fluid so returned to US Filter has not been mixed with h	e used US Filter degree 3 Filter Reuse Program	asing fluid (Le. Min will be utilized as a	neral spirits, an effective			al if Conditionally Exempt : lefined in 40 CFR 261.5 al if Do-it-yourself collection OR hereby certifies that the re			EP	A 1D#	PCR's as defined in 41
-	All consuments that may be present in the degreasing fluid are cor of the solvent as a degreaser or cleaner. I have reviewed our phy	entammants resulting from Visical facilities, administra	m, and incidental to, rative practices, and	normal use		a used oil as de certifies that the	OR hereby certifies that the right not hazardous waste or been slined in 40 CFR part 279, the rebuttable waste presumption in the production of the producti	GENERATOR certifies the on under 40 CFR Part 279	at the total halogen has been rebuited	content is less. The GENERA	than 1,000 ppm, or th TOR will be responsit	e GENERATOR hereby ble for any and all costs
-	procedures and based on this review do willing make this true, accine Reuse Solvent QA & QC Yes/No.	Yes No	Rep Initials			that to the best Shipping Deci		ation presented herein is co	rrect and accurate	, and I am author	onized to sign on behi	alt of the GENERATOR
		Light assem	nbly is in good work	7.		Transporter in		ulations of the Department of	of Transportation.	Desi	Ignated Facility	
1	Fusible link operational Authorization Signature lagree to pay for the above services and/or products and to be	•	,	-		US Filter Transp 1657 Commerce South Bend, IN	a Dr., Suite 10B US 46628 EF	S DOT ID#: 828559 PA ID#: INR000022798		Plant (800)	South Alexander Stre 1 City, FL 33563) 235-0189, Ext 3	
	and on the reverse side of this document.	. Odin by the terms and	-7 / R	di above	5-06	EMERGENCY	CONTACT CHEATRED (BOO)	424-9300	6	A TI	ID#; FLD065680613	137 16 4
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,	Parent of the Control									200		

SERVICE ORDER

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A Siemens Business US FILTER RECOVERY SERVICES (MID-ATLANTIC), INC. 14950 Heathrow Forest Pkwy, 250, Houston, TX 77032 FRINTED PER STEVE W KS 1 334046 1-800-235-0189 **CUSTOMER CONTACT** PAGE MCCLOUD RALPH PROBLEM PHONE NUMBER TYPE CODE 813-225-3182 RD SITE NUMBER NAME AND ADDRESS PRIORITY 56622201 TECO SUBSTATION CALL WAS TAKEN ON 05-31 BY MOLA P.O. NUMBER ONE MEEDED 2200 E SLIGH AVE PROBLEM SYNOPSIS, AS REPORTED \$500004 T'LANT CITY DEFAU 33610-1334 USED OIL M/A NUMBER PROMISE DATE, TIME MA0318487 05-31-06 TRAILER NO UPTIME UNIT NO. TM ARRIVE DATE ARRIVE TIME CLOSE DATE **CLOSE TIME** JOB COMPLET

PART / DESCRIPTION	4(01000)		569	28	7		× 30	1.0	6-1-6	0648	016	9	748	(VE	S .
COL-UOIGA USED OIL IND GA BB/ 1061 X Combustible liquids n.o.s.(Petroleum Oil 38013		PART / DESCRIPTION		U/M	QUANTITY	нм		SHIPPIN	G DESCRIPTION	651	SERI	AL#	# CON	IT.	TYPE
USED OIL IND GA BB/ 1000), 3, NA, 1993, PGIII	COL-LOTOA			C) A	-	- V	Commenter of the first section				GLYCOL	pН	BRIX	SNIFFER	C-D-T
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Reuse Qualification Statement

By signing this document, I hereby certify that I understand the used US Filter degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to US Filter for inclusion in the US Filter Reuse Program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the Program, I further certify that any used degreasing fluid so returned to US Filter has not been mixed with hazardous waste or other objectionable substances. All constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do willing make this true, accurate and complete certification.

Reuse Solvent QA	å	UU
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162 140	
	Used solvent passed visual inspection
	Used solvent has no unusual odor
	Parts Cleaner is clean (front/back)
	Fusible link operational

Yes No	Rep Initials
	Light assembly is in good working order Lid is unobstructed Parts Cleaner is properly grounded

Authorization Signature

I agree to pay for the above services and/or products and to be bound by the terms and conditions : and on the reverse side of this document.

PRINT CUSTOMER NAME

449527

ORIGINAL

Initial if Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.5

Initial if Do-it-yourself collection center

EPA ID#1 The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by US Filter does not contain any PCB's as defined in CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR here certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all co including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I cer that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATC

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information:

US Filter Transport, Inc. 1657 Commerce Dr., Suite 10B South Bend, IN 46628

US DOT ID#: 828559

EPA ID#: INR0000227

EMERGENCY CONT

DRIVER SIGNATURE

Designated Facility

Generator

105 South Alexander Street Plant City, FL 33563 (800) 235-0189, Ext 3

EPA ID#: FLD065680613

LF 070 Rev. B

LF 070 Rev. B

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signing this document. I hereby certify that I understand roleum naphtha) returned to US Filter for inclusion in the stitute for chemical product. For the purpose of qualifying t reasing fluid so returned to US Filter has not been mixed with constituents that may be present in the degreasing fluid are he solvent as a degreaser or cleaner. I have reviewed our cedures and based on this review do willing make this true, successful the solvent DA & CC is No Used solvent passed visual inspection Used solvent has no unusual odor Parts Cleaner is clean (front/back) Fusible link operational intercritation Signature gree to pay for the above services and/or products and to do not the reverse side of this document. PRINT DISTOMER NAME	US Filter Reuse Program will be utilized as an oparticipate in the Program, I further certify that th hazardous waste or other objectionable substate contaminants resulting from, and incidental to, nephysical facilities, administrative practices, and of accurate and complete certification. Yes No Rep Initials Light assembly is in good working the complete certification. Parts Cleaner is properly ground be bound by the terms and conditions set forth	ral spirits, effective any used noes. CFR 761 a a used oil certifies the including, that to the shipping order Us Filter T 1657 Com South Ben above DRIV		center terial collected from the GENEI nixed with a listed or characteris ENERATOR certifies that the t under 40 CFR Part 279 has be sting, and transportation if the n on presented herein is correct a als are properly classified, desc utions of the Department of Tran OCT ID#: 828559 ID#: INROQQQ22798	RATOR'S facility by US Fi ter stic hazardous waste as defin total halogen content is less total halogen content is less total halogen contains PCB's or is cand accurate, and I am authority of the content of the conte	ed n 40 CFR 261. If the mater han 1,000 ppm, or the GENER OR will be responsible for any determined to be a hazardous rized to sign on behalf of the G d labeled, and are in proper c linated Facility outh Alexander Street City, FL 33663 D#; FLD065680613	rial collected is AATOR hereby y and all costs waste. I certify GENERATOR. condition for
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ENVIRONMENTAL AFFAIRS MEMORANDUM

TO:

Jim Cook

FROM:

Beverly Morgan

DATE:

October 24, 2001

SUBJECT:

Central Operations Center - Spill Prevention Control and Countermeasure

(SPCC Plan)

The SPCC plan for the Central Operations Center has been updated and re-certified as required once every three years or whenever there is a change in facility design, construction, operation, or maintenance which could materially affect the potential for oil discharges into a navigable waterway.

The SPCC Plan has been prepared pursuant to the U.S. Environmental Protection Agency (EPA) regulation 40 CFR Part 112, Oil Pollution Prevention for non-production onshore facilities. The purpose of the plan is to minimize the potential for spills, prevent oil from leaving the site, and provide the most efficient cleanup methods.

The departments which store or contain oil and are therefore covered by this plan include Facility and Fleet Services, Substation Operations, Investment Recovery, and Warehousing and Material Services.

Seven copies are provided in this submittal and should be issued to the following personnel: Steve Hurner, Steve Turkett, Ron Clark, Wendell Welsh, John Douty, Gerald Johnson, and yourself. Enclosed you will find a cover sheet printed on cardstock to be inserted in the front sleeve of your three-ring binder. Please remove from your existing manual the entire text contents, keeping the drawing behind Figure 1 (Site Layout/Drainage).

If you have any questions regarding this plan, please let me know.

C (enc):

J. L. Estes (enc)

r: D. M. Lukcic

L. Robinson (enc)

R. E. Stafford

HM 13.6

C 2.2 (w/o enc)

SPILL PREVENTION CONTROL AND

COUNTERMEASURE PLAN

FOR

TAMPA ELECTRIC COMPANY



TAMPA ELECTRIC

CENTRAL OPERATIONS CENTER

LOCATED

22ND STREET AND SLIGH AVENUE

TAMPA, FLORIDA

OCTOBER 2001

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

GENERAL INFORMATION

Tampa Electric Company

Company Name:

Date: 10-23-01

Facility Name: Facility Location:	Central Operations Center 22 nd Street and Sligh Avenue
Type of Facility:	Electrical Distribution Operations Center
Date of Preparation:	December 1996
Date of Revision:	October 2001
<u>.</u>	MANAGEMENT APPROVAL
Signature: — &	Steven M. Hurner
Title:	Manager, Substation Operations
I hereby certify that I have examine Parts 112.7, attest that this Plan ha conforms to Part 112.7.	CERTIFICATION ed the SPCC Plan, and being familiar with the provisions of 40 CFR, as been prepared in accordance with good engineering practices and
	Gwen L. Shofner Printed Name of Registered Professional Engineer
	ans Shu

Signature of Registered Professional Engineer

Registration No.: 45382

<u>Florida</u>

State:

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1.0 PURPOSE AND SCOPE

This Spill Prevention, Control, and Countermeasure (SPCC) plan has been prepared pursuant to current 40 Code of Federal Regulations (CFR) 112 regulations on oil pollution prevention. The SPCC plan will be reviewed and evaluated at least once every 3 years or whenever there is a change in facility design, construction, operation, or maintenance which materially affects the potential for discharging oil into a navigable waterway.

This plan will be filed at the Central Operations Center, Central Service Area Support files. Mr. Steve Hurner, Manager, Central Service Area, is responsible for the implementation of this Plan. Copies will be made available at the Environmental Affairs Department.

2.0 GENERAL FACILITY INFORMATION

2.1. Site Description

Tampa Electric Company's Central Operations Center (COC) houses many functions pertinent to the construction and maintenance of the Company's transmission and distribution system. Located within the site are Facility Services, Fleet Services, Substation Operations, Stores, and Investment Recovery/Transformer Shop.

The transformer and substation shops test, maintain and repair transformers, which have failed, and prepare new transformers for service. Transmission and distribution transformers are filled with a highly refined, non-PCB mineral oil. New, as well as used transformer oil, is stored near the transformer shop in oil storage tanks. In addition to the storage tanks, there are up to seven mobile tank trailers on the premises, which are used to transport both new and used oil. The tank trailer locations are shown in Figures 1 and 2. An inventory of these tank trailers is listed in Table 1. The tank capacities are provided in Table 1.

The Storage Yard contains oil-filled electrical equipment, including transformers, oil-filled circuit breakers, regulators, reclosers, and capacitors. The area in which this equipment is located is illustrated in Figure 1.

A garage facility used for fleet maintenance and repair is located on-site. The garage stores gasoline and diesel fuel in underground tanks on-site. The tank locations are shown in Figures 1 and 2. The tanks' capacities are shown in Table 2.

The PCB storage facility, which is used for storage of PCB and PCB contaminated items and articles, is located on-site. All contaminated items stored for disposal are removed from storage and properly disposed within one year of receipt for storage. The location of the PCB storage facility is illustrated in Figures 1 and 2.

3.0 GARAGE FACILITY (FLEET SERVICES)

Four 275 gal aboveground tanks containing petroleum products such as lube oil, hydraulic fluid, transmission fluid and gear oil is stored inside the garage building. These tanks are located within secondary containment. Potential for an oil spill is minimal and would be

contained inside the garage. A 400-gal double wall tank situated outside of the building is used to store waste oil. This tank is located adjacent to the north wall.

In addition, one mobile fuel tanker with compartments for unleaded gasoline and diesel fuel is managed by Garage personnel. The mobile tanker has a 600 gallon unleaded fuel compartment and a 1,200-gallon diesel fuel compartment.

3.1. Description of Containers and Mobile Fuel Tanker

There may be two 55 gallon drums containing specialty oil housed in the same containment area as the four 275 gallon tanks in the Old Wash Bay area. The mobile fuel tanker is designed for the containment of gasoline and diesel fuel and is constructed of material that is compatible with the product it stores. The mobile tanker is stored with the Substation Shops' mobile tankers within secondary containment.

3.2. <u>Containment and/or Diversionary Structures</u>

If a leak should occur from an oil-filled tank or drum while in storage, the spill would be contained within the storage area.

In addition, an oil spill response procedure is provided in Section 11.0. Included in this plan is a list of equipment available at the COC warehouse for spill response. A list of equipment is indicated in Table 3. A spill containment drum is located in the garage area in front of the tool room cage.

In addition to an oil spill contingency plan, Tampa Electric Company will minimize the possibility of a serious oil spill by: 1) continuing to stress proper work practices regarding oil storage and handling; 2) continuing existing precautions to prevent an oil spill, such as monthly inspections, and maintenance of oil handling equipment and drums; 3) annual training of employees concerning proper oil spill containment and control techniques (Employees are generally trained in spill prevention measures within the transportation garages. Therefore, transferred employees are familiar with oil spill prevention, containment, and cleanup activities); 4) maintaining adequate stock of cleanup materials to be used, should an oil spill occur.

3.3. Records and inspections

All tanks and containers which store fuel, oil, or transmission and hydraulic fluids at the Garage Facility are inspected monthly for leaks and structural integrity.

Potential problems will be reported immediately to the appropriate supervisor. All inspection records shall be maintained by the supervisor for a minimum of three years.

4.0 STATIONARY STORAGE TANKS

Aboveground stationary storage tanks (ASTs) are located throughout the Central Operations Center. Their capacities range from 275 gallons to 25,782 gallons. Two underground fuel

storage tanks (USTs) are also located at the Central Operations Center. Both USTs have 10,000-gallon capacities.

- Substation Operations is responsible for two 2,865 gal ASTs and one 25,782 gal AST containing mineral oil.
- The Transformer Shop is responsible for a 1,000-gallon and 10,000 gallon Convault ASTs.
- The Garage Facility is responsible for both USTs. All of the stationary tanks are identified in Table 2.

4.1. <u>Description of Tanks</u>

The aboveground storage tanks are constructed of materials that are compatible with the petroleum products stored over the expected range of storage conditions. These tanks are used by either the transformer shop or the substation shop for the storage of new and used mineral oil. Table 2 identifies the construction material of each tank.

The underground storage tanks at the Central Operations Center are used for the storage of gasoline and diesel fuel. Both of the tanks are constructed of fiberglass. These tanks are regulated by Ch. 62-761, FAC, which is administered by the Florida Department of Environmental Protection (FDEP). The storage tanks locations are illustrated in Figures 1 and 2.

4.2. <u>Containment and/or Diversionary Structures</u>

All tanks are equipped with secondary containment. In addition, aboveground storage tanks are equipped with tank level indicators. Before transferring oil into a tank, the tank level is checked to assure that adequate volume is available to receive the oil to be transferred. Also, during the transfer, the tank level indicators are monitored to prevent an overflow of oil.

Rainwater retained in secondary containment structures, which has no visible traces of oil, is discharged by the department that is responsible for the stationary tanks (i.e., Transformer Shop, or Substation Shop). Rainwater is discharged through manually operated gate valves from the diked area to the yard. If oil is detected in the water, absorbent pads are used to remove the oil before water is discharged into the yard. The valve is resealed following drainage of the rainwater under responsible supervision. Records are kept whenever rainwater is drained from the diked area. These records shall be maintained at the facility for at least 3 (three) years.

An oil spill response procedure is provided in Section 11.0. Included in this plan is a list of equipment available at COC Stores and Investment Recovery for spill response. A list of equipment is provided in Table 3.

In addition to an oil spill contingency plan, Tampa Electric Company will minimize the possibility of an oil spill by 1) continuing to stress appropriate work practices regarding oil

storage and handling; 2) continuing existing precautions to prevent an oil spill such as monthly scheduled inspections and maintenance of oil handling equipment, tanks and drums; 3) providing secondary containment for tanks; 4) annual training of employees concerning proper oil spill containment and control techniques; 5) maintaining adequate stock of cleanup materials to be used should an oil spill occur.

4.3. Records and Inspections

All visible equipment, tanks and lines associated with the aboveground tanks are inspected monthly for leaks in gaskets, seals, etc. Any leaks are immediately reported to the appropriate supervisor and repaired. Inspection records shall be maintained by the supervisor for a minimum of three years.

The double-walled fiberglass underground storage tanks have continuous leak detection devices and overfill protection. The release detection system is inspected monthly in accordance with Chapter 62-761 FAC which is administered by the FDEP.

5.0 MOBILE TANKERS

In addition to the stationary storage tanks, there are seven mobile tank trailers stored on the premises. The mobile tankers are used to transport new and used oil, as well as gasoline and diesel fuel, and are stored within secondary containment in the substation yard. The total capacities range from 2000 gallons to 9000 gallons. The compartmented capacity for the mobile tankers range from 500 gallons to 9,000 gallons.

5.1. <u>Description of Tanks</u>

The tank trailers are designed for the containment of oil and fuels. They are constructed of aluminum material. Typically, these tank trailers store a minimum quantity of oil, and rarely store oil up to their maximum capacities. The tank trailers' locations are shown in Figures 1 and 2.

5.2. Containment and/or Diversionary Structures

One of two methods is used to control the overflow of oil from the tank trailers. A flow meter is used while pumping oil into the tank, or the level of oil during filling is observed through a manhole located on top of the tank. A level indicator gauge is installed on tanker #8418.

All mobile tankers are inspected monthly for leaks in gaskets and seals. Any leaks are immediately contained, controlled, reported, and repaired.

Spills occurring because of tank overflow would occur only during the filling of a tank. The direction of flow would be out the top of the tank and down the sides of the tank. Spills from this activity would be detected by the operator and quickly controlled and contained.

Spills occurring from any of the tankers located in the substation yard, due to tank rupture, would flow into a curbed area surrounding the mobile tankers. The curb is designed to contain 110 percent of the entire contents of the single largest tank compartment.

Rainwater which has no visible traces of oil is discharged from the mobile tankers' secondary containment area into the yard. The mobile tankers are located at the Substation Shop yard. If oil is detected in the water, absorbent pads are used to remove the oil before the water is discharged by the facility. Investment Recovery's tanker (#8418) located adjacent to the 10,000 gal convault tank is stored empty except when it is used to transfer oil from CSA to the Gannon Power Plant for energy recovery.

In addition, an oil spill response is provided in Section 11.0. Included in this plan is a list of equipment available at the COC storeroom for the spill response. A list of equipment is indicated in Table 3.

In addition to an oil spill contingency plan, Tampa Electric Company will minimize the possibility of an oil spill by 1) continuing to stress proper work practices regarding oil storage and handling; 2) continuing existing precautions to prevent an oil spill, such as monthly scheduled inspections and maintenance of oil handling equipment; 3) providing secondary containment for tanks; 4) annual training of employees concerning proper oil spill containment and control techniques; 5) maintaining adequate stock of cleanup materials to be used, should an oil spill occur.

5.3. Records and Inspections

All visible equipment, tanks and lines are inspected monthly for leaks in gaskets, seals, etc. Any leaks are immediately reported to the supervisor and repaired. The inspection record shall be maintained by the supervisor for a minimum of three years.

6.0 OIL-FILLED ELECTRICAL EQUIPMENT IN STOCK

There are transformers, mineral oil-filled circuit breakers, circuit reclosers, regulators, oil switches and capacitors stored on-site at Central Operations Center. The area in which this equipment is located is indicated in Figure 1.

6.1. Description of Equipment

Oil-filled electrical equipment which is stored at the Central Operations Center storage yard may contain quantities of oil ranging from 1.5 gallons, such as a small capacitor, to 5500 gallons, such as a substation transformer.

6.2. Containment And/or Diversionary Structures

Equipment in storage cannot be enclosed within a containment structure because of the need for regular access to the storage area by motor vehicles. Therefore, the storage of equipment in the storage yard will be managed to minimize the potential of a spill. Equipment will be inspected periodically and at least monthly for leaks. Leaks which are detected will be contained and controlled, and the equipment will be repaired immediately. In the event of a spill, adequate absorbent and containment materials will be readily available for diking and berming the spilled oil.

An oil spill response procedure is provided in Section 11.0. Included in this plan is a list of equipment available at the COC storeroom for spill response. A list of equipment is indicated in Table 3.

In addition to an oil spill contingency plan, Tampa Electric Company will minimize the possibility of an oil spill by 1) continuing to stress proper work practices regarding oil storage and handling; 2) continuing existing precautions and maintenance of oil handling equipment and drums; 3) annual training of employees concerning proper oil spill containment and control techniques; 4) maintaining adequate stock of cleanup materials to be used, should an oil spill occur.

6.3. Records and Inspections

The oil-filled equipment in stock is inspected monthly for structural integrity, as well as leaks. Potential problems will immediately be reported to the appropriate supervisor. The inspection record shall be maintained at the facility for a minimum of three years.

7.0 TRANSFORMER SHOP/PCB STORAGE AREA

- Commence of the second

The Transformer Shop stores transformers to be repaired near the east-side of the building. The equipment is informally inspected at least 5 days/week; with one formal inspection being conducted monthly. The monthly inspection record is maintained for at least three years.

A PCB storage facility as required by EPA regulation 40 CFR 761 which is used for storage of PCB (500 ppm) and PCB-contaminated (50 to 499 ppm) items and articles, is located at the Central Operations Center. All PCBs and PCB items stored for disposal are removed from storage and properly disposed within one year of receipt for storage for disposal. The PCB storage facility consists of the following: Storage for Disposal Building, Adjacent Storage for Disposal. The locations of these storage areas are illustrated in Figure 1.

The PCB Storage for Disposal Building - is used for the storage of PCB oil, contaminated solids, leaking contaminated equipment, and other PCB items. This building will be managed such that reserve storage is immediately available for the storage of ten percent of the volume of equipment stored in the Adjacent Storage for Disposal Area.

The Adjacent Storage for Disposal Area - is an area used to store non-leaking and structurally undamaged electrical equipment adjacent to the PCB storage building. Storage in this area is allowed only if the storage for disposal building has immediately available reserve storage space equal to ten percent of the volume of PCB and PCB contaminated equipment stored. Storage is managed such that PCB articles can be located by the date of entry for storage and shipped on a first in/first out policy.

7.1. Description of Containers

The required container used for the storage of PCBs and PCB items is a Department of Transportation (DOT) approved 55-gallon drum made of low- carbon steel. Drums with non-removable heads are used for PCB liquids. Drums with removable heads are used for other

PCB wastes. Containment pans are required when a leaking piece of equipment is too large to fit into the 55-gallon drum. (40 CFR 761)

7.2. Containment and/or Diversionary Structures

The Storage for Disposal Building - is constructed to prevent rainwater from reaching stored PCBs and PCB items. The concrete floor area has a six-inch concrete curb, which will contain a volume of fluid equal to at least twice the largest PCB article or PCB container stored within the area, or 25 percent of the total internal volume of all PCB articles or PCB containers within the storage area, whichever is greater. The curbed area contains no drain valves, floor drains, sewer lines, or other openings that would permit the escape of liquid PCBs.

The Adjacent Storage for Disposal Area does not have a containment structure because of the need for regular access to this area. Electrical equipment stored in this area will be managed to minimize the potential for a spill. Equipment will be inspected for leaks on a weekly basis.

An oil spill response procedure is provided in Section 11.0. Included in this plan is a list of equipment available at the storeroom for the spill response. A list of equipment is indicated in Table 3.

In addition to an oil spill contingency plan, Tampa Electric Company will minimize the possibility of an oil spill by: 1) continuing to stress proper work practices regarding oil storage and handling; 2) continuing existing precautions to prevent an oil spill, such as monthly scheduled inspections and maintenance of oil handling equipment; 3) annual training of employees concerning proper oil spill containment and control techniques; 4) maintaining adequate stock of cleanup materials to be used, should an oil spill occur.

7.3. Records and Inspections

The PCB Storage for Disposal building and Adjacent Storage for Disposal areas are inspected on a monthly basis. Containers, drums and equipment are checked for structural integrity, as well as for leaks. Potential problems will be reported to the appropriate supervisor. The inspection record shall be kept at the facility for a minimum of three years.

8.0 FACILITY DRAINAGE

Stormwater runoff from the Central Operations Center drains to on-site storm drains. Flow patterns and storm drain locations are shown in Figure 1. All singled walled storage tanks are diked.

9.0 **SECURITY**

The Central Operations Center is completely enclosed by fence surrounding the facility, and opened gates are manned 24 hours a day. Ample lighting is provided for the entire operations center.

10.0 TRAINING PROCEDURES

Annual briefings are conducted for pertinent personnel at the Central Operations Center to assure adequate understanding of the SPCC plan. The training emphasizes proper operating procedures, maintenance of equipment, inspection, reporting procedures, oil containment and cleanup procedures, and a review of any recent oil spills. Qualified individuals in conjunction with annual RCRA training present this briefing.

11.0 SPILL RESPONSE PROCEDURE

The following actions are taken when responding to a release of petroleum to the land or storm drains. The Energy Delivery Environmental Procedures Manual provides additional guidance and specific procedures for containing and cleaning non-PCB mineral oil, PCB-contaminated, and PCB oil spills.

- 1. Any Employee who observes a leak or spill event will inform the facility Emergency Contact (EC) person (see Table 5) and take steps to contain or control the spill or leak until additional assistance is obtained. These steps include controlling and/or confining the spill, and catching, containing and confining all oil. Absorbent materials and absorbent pads for temporary diking are available on- site. Metal pans are available for containment of smaller leaking equipment and drums.
- 2. The facility may request Facility Services Personnel to assist with clean-up activities.
- 3. If additional assistance is needed for the cleanup of a petroleum spill on the soil or in the drainage ditch, the Emergency Response Contractor identified in Table 4 may be notified.
- 4. The facility EC will identify the character, source, amount, and extent of released materials by any means appropriate.
- 5. The facility EC will notify Environmental Affairs Department with information regarding the extent of the event.
- 6. The Facility Services Department will make arrangements with the Emergency Response Contractor (Table 4) to provide assistance with cleanup if necessary.
- 7. Facility Services will supervise cleanup activities at the site, ensuring that all oil and contaminated materials are collected and disposed of properly.
- 8. Environmental Affairs will notify appropriate Local, State and Federal agencies with details of the event.

A list of Emergency Contact Personnel is provided in Table 5. The emergency equipment that is available on-site for containment and control is listed in Table 3. The Emergency Service and Response teams that are available are listed in Table 4.

If a spill enters a storm drain or goes off the premises, the EC shall provide the following information to Environmental Affairs, the department responsible for notifying the proper authorities:

- Time of Spill
- Type of Spill
- Volume of Spill
- Source of Spill
- Description of Cleanup Operation
- Persons on the Scene

TABLE 1: TANK TRAILERS

Vehicle Number	Location/ Area	Tank Use	Capacity (Gallons) *	Largest Compartment (Gal.)	Preventative System
8212	Subst. Shop	Mineral Oil	8,750	1,300	Curbing
8386	Subst. Shop	Waste Oil	8,000	N/A	Curbing
8349	Subst. Shop	Mineral Oil	8,500	1,300	Curbing
8263	Subst. Shop		7,025	1,300	Curbing
8288	Subst. Shop	Mineral Oil	9,000	1,300	Curbing
2219	Garage Facility	Gas/Diesel	2,000	1,000	Curbing
8418	Investment Recovery	Mineral Oil	9,000	9,000	None*

^{*}As described in Section 5.2, this tanker is stored empty adjacent to the 10,000 gal. convault aboveground tank.

TABLE 2: STATIONARY STORAGE TANKS

Tank Number	Location/	Capacity (Gallons)	Preventative System	Tank Use	Tank Construction Material
1	Substation Shop	2,865	Concrete Wall	Mineral Oil	Steel
2	Substation Shop	2,865	Concrete Wall	Mineral Oil	Steel
3	Substation Shop	25,782	Concrete Wall and Curbing	Mineral Oil	Steel
4	Garage	10,000	Continuous Leak Detection; Overfill Protection	Gasoline Underground	Double-Walled Fiberglass
5	Garage	10,000	Continuous Leak Detection; Overfill Protection	Diesel Underground	Double-Walled Fiberglass
6	Garage	275	Concrete Wall	Lube Oil	Steel
7	Garage	275	Concrete Wall	Hydraulic Fluid	Steel
8	Garage	275	Concrete Wall	Transmission Fluid	Steel
9	Garage	275	Concrete Wall	Gear Oil	Steel
10	Garage	400	Double-Walled Steel	Waste Oil	Steel
11	Investment Recovery	1,000	Convault Double-Walled Tank w/Interstitial Monitoring	Mineral Oil	Concrete and Steel
12	Investment Recovery	10,000	Double-Walled Tank w/Interstitial Monitoring	Mineral Oil	Concrete and Steel
13	Substation Shop	500	Double-Walled Tank		

TABLE 3: EMERGENCY EQUIPMENT (On-Site)

Item	Description	Location
Telephone System	Telephone system w/Paging Capability	Throughout Facility
Spill Containment and Cleanup Equipment	Spill Response Kit:	Investment Recovery Transformer Shop Substation Shop Fleet Services
Spill Containment and Cleanup Equipment	Containment pans	Investment Recovery, Substation Shop Stores
Spill Containment and Cleanup Equipment	Dike/berm material (dirt)	Facility Services Investment Recovery Stores
Fire Control Equipment	Extinguishers, hydrants, hoses	Throughout Facility

TABLE 4: EMERGENCY RESPONSE CONTRACTOR LIST FOR GENERAL **EMERGENCY RESPONSE AND OPA 90** General Emergency Response (Various Oil/Petroleum released to soil and solid surfaces) (A) Transformer oil containing PCBs (refer to Equipment Decals) Fuels (Unleaded, Diesel) Used Oil Lube Oil No. 6 Oil Antifreeze Sodium Hypochlorite Acids Dumpster with oily soil Asbestos Release **(B)** Open Water/Shoreline Cleanup (Various oil/petroleum releases to surface waters) **(C)** TRUSSCO Inc. (formerly Gulf South Systems) (A) Lakeland Office: (863) 665-2664 Corporate Office: (800) 804-8040 Pete VanFossen Mobile: (813) 503-3480 **Thomas Clark** Mobile: (863) 559-9448 (A) (B) A & A Coastal 3209 East 3rd Avenue Tampa, FL 33605 Karen Yeatman (813) 248-6055 24 Hour Hot Line (813) 677-3805 or (813) 248-6055

(A)(C)American Compliance Technology (ACT) 1875 West Main Street Bartow, FL 33830 K. C. Straub (863) 533-2000 (800) 226-0911 (24 Hr.) (A)(C)**SWS Emergency Response** Jim Weber, Sr. 8100 Park Boulevard #A36 Jim Weber, Jr. Pinellas Park, FL 33781 John Rider (800) 852-8878 24 Hr. (800) 852-8878 (A) Clark Environmental Industrial Parkway Mulberry, FL 33860 Jim Clark (863) 425-4884 ****** **International Petroleum Services** (A) 105 South Alexander Street Plant City, FL 33566 Mike Anderson (800) 282-9585 (813) 478-7702 Mobile Florida Spill Response Corp. **(C)** 605 Townsend Road Cocoa, FL 32926 Martin Koivu, President (321) 631-7778

(B) Energy Service Insulation, Inc. (ESI)
102 North 20th Street
Tampa, FL 33605

Rick Swindle (813) 248-6248

TABLE 5: EMERGENCY CONTACT PERSONNEL

/Name	Location	Ext.	Home Phone	Pager	Mobile Phone
*Steve Turkett	Transportation	36355	689-0889	266-1043	765-8184
Ron Clark	Facility Services	36204	837-3775	266-6398	390-5410
Bob Stafford	Environmental Affairs	46840	223-2430	268-6806	
Jim Cook	Environmental Coordinator	36069	971-6709	266-3332	765-2579
Wendell Welsh	Investment Recovery	36144	752-9589	266-7636	
John Douty	COC-Stores	36205	677-5928	266-7839	220-9145
Gerald Johnson	Substation Ops.	36161	352/754-8424	266-2560	220-2793

*COC Emergency Coordinator

EMERGENCY SERVICES AND RESPONSE TEAMS

Tampa Fire Department/City Paramedics 911
Tampa Police Department 911

Hillsborough County Fire Marshall *621-6019 Hillsborough County Sheriff's Office *224-9911

*NOTE: These phone numbers dial into the Emergency 911 system

FIGURE 1: CENTRAL OPERATIONS CENTER SITE LAYOUT/DRAINAGE

FIGURE 2: CENTRAL OPERATONS CENTER TANK LOCATIONS

LOCATION OF TANKS AT CENTRAL OPERATIONS CENTER

TYPE	*MAX. GALLONS	DEPARTMENT/VEHICLE #
P1	30,000/*24,000	Transportation/Stationary
P2	240/*192	Transportation/Wash Area
P3	240/*192	Transportation/Wash Area
-13	240/ 172	Transportation wash Area
M1	2,865	Substation/Used Oil
M2	2,865	Substation/New Oil
M3	10,000	Transformer Shop/Junk Oil
M4	1,000	Transformer Shop/Used Oil
M5	8,500	Transformer Shop/Tanker #8418 (fill line @ 6,700)
M6	7,025	Substation Tanker #8263
M7	6,625	Substation Tanker #8386
M8	7,050	Substation Tanker #8212
M9	6,425	Substation Tanker #8288
M10	6,350	Substation Tanker #8349
M11	25,782	Substation/North Yard
M12	400	Transportation/Used Oil
M13	600	Substation Portable Tank, PT #1, transported by flatbed #1438
M14	600	Substation Portable Tank, PT #2, transported by flatbed #2821
M15	275	Transportation/50 W-40
M16	275	Transportation/Dexron
M17	275	Transportation/Hydraulic Oil
M18	275	Transportation/Gear Oil
M19	100	Transportation UST/Oil Water Separator
M20	1200	Substation Portable Tank, PT #3, square
D1	**1.200	Transport of Market Market HOOA1
D2	**1,200 400	Transportation/White Mobile #2841
D3		Building Service/Emergency Generator M048
D3	10,000	Transportation/Fueling East
D5	200	Substation/Emergency Generator #8287
D6	80	Substation/Emergency Generator #8363 75 kW
D6 D7	120	Substation/Emergency Generator #8452 225 kW
D8	500	Substation Annex/Emergency Generator, Convault in yard
D8	280	Transportation/Mobile #8603
לע	1,000	Standards/Emergency Generator #M045 (Convault)
G1	10,000	Transportation/Fueling East
G2	**600	Transportation/White Mobile #2841
G3	280	Transportation/Mobile #8704

^{**1,800} gallon capacity Tank Truck = 1,200 Diesel, 600 Gasoline Revised: 3/01

CODE	DESCRIPTION
P	PROPANE, LPG*=80 capacity
M	MINERAL/VEHICLE OIL
D	· DIESEL FUEL 2
G	GASOLINE

APPENDIX A:
Discussion of Conformance of SPCC Plan with Sections of 40 CFR 112.7

APPENDIX A: Discussion of Conformance of SPCC Plan with Sections of 40 CFR 112.7 SECTION DISCUSSION OF CONFORMANCE

- 112.7 (a) No reportable spill events have been experienced by Central Operation Center since the last review period.
 - (b) Experience has indicated the potential for a spill due to tank and equipment failure is low.
 - (c) All fuel oil storage tanks have a form of secondary containment impervious to prevent discharge oil from reaching a navigable water course.
 - (d) Not applicable since 112.7(c) is practicable.
 - (e) (1) Facility Drainage
 - (i) Drainage from bermed areas will be restrained by valves. If the operator detects the presence of oil in the accumulated water, appropriate cleanup procedures would be completed prior to discharge to the oily sewer.
 - (ii) Valves used for drainage of bermed areas will be of manual, open-and-close design.
 - (iii) Not applicable since other preventive measures will be employed.
 - (iv) Not applicable since (i), (ii), and (iii) will be met.
 - (v) Not applicable since (i), (ii), and (iii) will be met.
 - (2) Aboveground Storage Tanks
 - (i) All tanks used for the storage of petroleum products are constructed of steel which is compatible with the material stored in the conditions of storage.
 - (ii) Aboveground storage tank installations are constructed so that a secondary means of containment is provided for the entire contents of the single largest tank plus sufficient freeboard to allow for precipitation. Berms are constructed of concrete which is impervious to spilled contents.
 - (iii) Accumulated rainwater in the bermed areas will be inspected for the presence of oil prior to being discharged to the drainage system. If water is contaminated, cleanup procedures will be completed prior to pumping.
 - (iv) Not applicable since tanks are aboveground.
 - (v) Not applicable since tanks are aboveground.

- (vi) Aboveground tanks will be frequently observed for signs of deterioration or leaking. Leaks will be immediately reported and repaired.
- (vii) Not applicable since there are not heating coils.
- (viii)A gauger is present during all unloading and transferring operations. When a tank becomes full, the gauger will suspend pumping.
- (ix) Not applicable since there will be no discharge of effluents from facility to navigable waters.
- (x) Visible leaks causing an accumulation of oil in bermed areas will be immediately repaired.
- (xi) Mobile tanks that store petroleum are stored within secondary containment.
- (3) Facility Transfer Operations, Pumping, and In-Plant Process
 - (i) Not applicable. There is no buried piping associated with aboveground tanks.
 - (ii) Not applicable.
 - (iii) Not applicable.
 - (iv) All aboveground valves and pipelines are inspected at least monthly.
 - (v) Not applicable.
- (8) Security
 - (i) Central Operations Center is surrounded by a fence. The station and gates will be manned 24 hours per day.
 - (ii) Any valves which would allow directed outward flow of oil will be securely kept in the closed position when not in use.
 - (iii) Not applicable.
 - (iv) Not applicable.
 - (v) The lighting throughout the facility.
- (10) Personnel, Training, and Spill Prevention Procedures
 - (i) An annual briefing is conducted for plant facility personnel to assure adequate understanding of the SPCC plan.

MEMORANDUM

TO:

F.J. Gonzalez

FROM:

R.E. Stafford

DATE:

February 9, 1988

SUBJECT: Central Operations Center, SPCC Plan

affere

As discussed during our meeting on January 29, 1988, please find attached copies of the conceptual secondary containment system drawings for the Transformer Shop, Substation Shop, North Yard Oil Tank and the Mobile Tanker Truck locations. Also enclosed are recommendations for containing and manageing oil spills from areas where secondary containment is not practical. Such areas include the Transformer Shop Drum Storage Area, Oil-filled Electrical Equipment in Stock (Stores Yard), and the PCB Storage Facility.

Once this information is evaluated, please inform me of the estimated costs for constructing the secondary containment systems for the above mentioned locations by February 11, 1988.

If you have any questions, please contact me at extension 34840.

R.E. Stafford

RES/kms/040/HH2

Attachment

cc: CP 6.10.5 HM 4.63

Route: J.L. Williams

A.S. Autry

V.S. Brueggemeyer

P.A. Ho

K.A. Durrell

STATIONARY STORAGE TANKS

Stationary storage tanks are comprised of three separate locations. The locations include the following: Substation Shop (Figure 1), North Yard Oil Tank (Figure 2), and the Transformer Shop (Figure 3).

In an effort to comply with the Federal Regulations, Section 40 CFR Part 112 regarding bulk oil storage tanks, secondary containment is recommended for these three locations.

As shown on the drawings, the calculated retention walls must contain the following volumes:

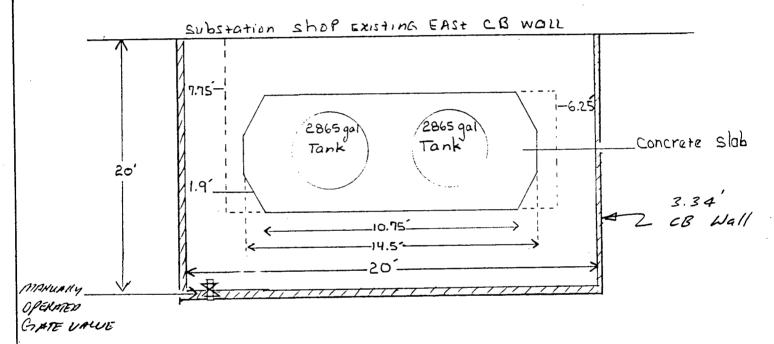
- Substation shop storage tanks = 532.4 CF
- North Yard Oil Tank = 4131 CF
- Transformer Shop Storage Tanks = 129 CF

Manually operated gate valves for water drainage are also shown on the drawings.

(Not fo scale)

SPCC. PLAN SUBSTATION SHOP STORAGE TANKS (2865 gal Capacities)

PLA N



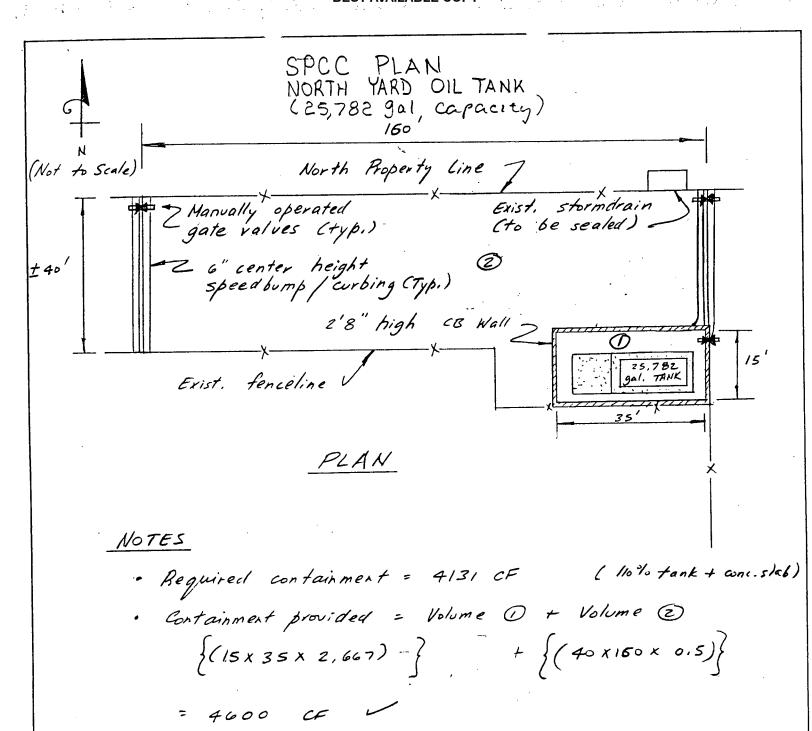
Notes

	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	required Containment	CALCULATED Retention Woll
L x W x H 14.5' x 6.25' x 1.33' = 121 Ft ³ 2(1.9'x 1.9'\(1.33'\) = 9.60 Ft ³ 121 Ft ³ - 9.60 Ft ³ 114.4 Ft ³	= 421 Fe ³	421 Ft ³ + 114,4 Ft ³ 532,4 Ft ³	LxWxH 17.5' x 9.2'x 3.34' = 544 Ft 3 note: need to relocate conduit on Substation Wall.
·			,

TAMPA ELECTRIC A TECOENERGY COMPANY

FIGURE 1

DATE



- · The primary containment area (), should be provided with a level indicator to alarm CSA personnel of potential overflow from this area.
- · Uniontaminated runoff can be drained from containment areas by means of mamually operated values, such as gate valves. No flapper type valves should be used. Records must be kept of valve openings.

 RES / PAH

TAMPA ELECTRIC A TECOENERGY COMPANY SPCC - Conceptual containment system, 25,782 gal Oil Tank * CSA * DATE /2/2/88
APPR

FTGURE

(Not to scale)

SPCC PLAN
TRANSFORMER SHOP
STORAGE TANKS
(500 gal capachics)

PLAN

MANUALLY

Profesed Secondary Containment Wall

(8" CB Wall)

COMPETE SLAR L X W X H 14' X 6.75' X 0.58' = 55 FE ³	_N STORAGE TANK CAPACITY = 74 Ft ³	REQUIRED	Required Contains CAPACITY 74 Ft ³ + 55 Ft ³ 129 Ft ³	ment CALCULATED RETENTION LOVALL L X W X H 17' X 11.5' X 0.667 = 130 Ft 3
		·		DATE

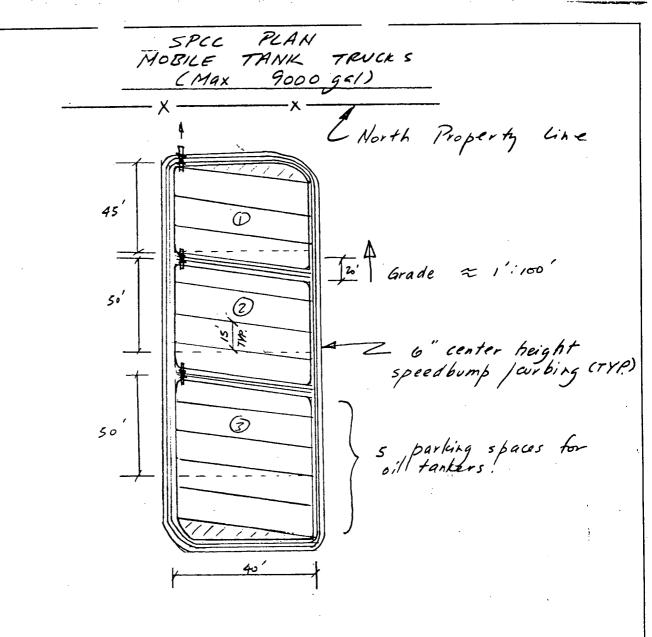
TAMPA ELECTRIC A TECO ENERGY COMPANY APPR _____

FTGURE

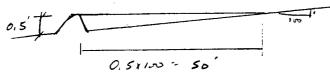
TANK TRAILERS

The Tank Trailers are comprised of five Mobile Tank Trailers located in the northeast section of the yard. In an effort to comply with the regulations, secondary containment is recommended for the locations. The secondary containment drawing for these tankers is shown in Figure 4. As shown in the drawing, the calculated retention wall must contain 1324 CF.

Manually operated gate valves for water drainage is also shown on the drawings.



· Required Containment = 9900 gals = 1324 CF (110%)



Total containment volume: $V, + V_2 + V_3 = V, + 2V_2$ = $\left\{0.5(0.5 \times 45 \times 40)\right\} + 2\left\{(0.3 \times 30 \times 40) + (0.3 \times 40 \times 20) + (0.2 \times 40 \times 20)\right\}$

- 436 + 7040

1490 CF. V

RES / PAH



SPCC - Conceptual containment system, gasoline mobile tanks * CSA *

FIGURE 4

DATE

TRANSFORMER SHOP DRUM STORAGE AREA

Approximately fifteen 55 gallon drums containing mineral oil may temporarily be stored under roof at the transformer shop. These drums are stored away from vehicular traffic and pose only a slight potential for an oil spill.

The potential of an oil spill from occurring in this area is unlikely and secondary containment is not practical. However, in the event of an oil spill a commitment to manpower and materials is required to contain and cleanup the oil.

Containment of a spill from the above area can be accomplished by using sand bags, absorbent materials, absorbent pads, and dirt for temporary diking. Also, metal pans should be available for the containment of the leaking drum(s).

Trained personnel, cleanup materials and containment pans should be available to satisfy the control and countermeasure requirement of the SPCC Plan.

OIL-FILLED ELECTRICAL EQUIPMENT IN STOCK

Oil filled electrical equipment such as transformers, oil filled circuit breakers, oil filled circuit reclosers, regulators, oil switches and capacitors is stored at the central operations center. The need for regular access to the storage yard by motor vehicles make secondary containment impractical. However, to comply with the SPCC plan requirements, a management commitment to manpower and materials is required in the event of a spill.

Containment of a spill from the above area can be accomplished by using sand bags, absorbent materials, absorbent pads, and dirt for temporary diking. Also, metal pans should be available for the containment of the leaking equipment.

Trained personnel, cleanup materials and containment pans should be available to satisfy the control and countermeasure requirement of the SPCC Plan.

PCB STORAGE FACILITY

A PCB storage facility which is used for storage of PCB and PCB contaminated items and articles is located at Material Recovery. There are four PCB storage locations which are designated as: Storage for disposed building, adjacent storage for disposal, 30 day storage for disposal, and storage for reuse.

The storage for disposal building is constructed to prevent rainwater from reaching stored PCBs and PCB items. This building also has the required six inch curbing for containment in the event of a leak or spill.

Containment of a spill from the above area can be accomplished by using sand bags, absorbent materials, absorbent pads, and dirt for temporary diking. Also, metal pans should be available for the containment of the leaking drum(s) or equipment.

Trained personnel, cleanup materials and containment pans should be available to satisfy the control and countermeasure requirement of the SPCC Plan.



ENERGY DELIVERY SAFETY. **ENVIRONMENTAL & TRAINING MEMORANDUM**

TO:

Energy Delivery All Areas

FROM:

Jim Cook

DATE:

July 21, 2006

SUBJECT: "Hazardous Materials and Waste"

ED Safety, Environmental & Training has presented approximately eight RCRA, SPCC and Universal Waste training classes this year. These classes reviewed the usage and disposal of both listed and non-listed hazardous materials and waste.

Mrs. Elizabeth Knauss, Manager of Southwest Region of the Department of Environmental Protection "DEP", performed an unannounced environmental audit at the Central Operations Center (COC) on March 14, 2006. One of the findings:

A gallon container of lacquer thinner, which contained the hazardous material methyl ethyl ketone (MEK), was used with rags in a clean up process. The rags were found in a processable-dumpster; this is a violation to 40 CFR 262.11; the rags should have been placed in a hazardous marked drum.

Please review the following items with your employees:

- Stress the importance of knowing the chemicals and products used at each area.
- Every area should have an inventory of all chemicals and products.
- Every area should have a Material Safety Data Sheet "MSDS" for each chemical and/or product.
- The employee should read the MSDS or label on the chemical and/or product prior to
- The employee should know what safety precautions and PPE to use prior to usage.
- The employee should know how to properly dispose of cleaning materials, waste, etc.

the you meed assistance or have any questions,

Memorandum

Environmental Protection

ENFORGEMENT/COMPLIANCE COVER MEMO

TO:

J.M. Farley, Interim of District Management

FROM/THROUGH:

William Kutash, Environmental Administrator ار المحري Jim Dregne, Environmental Manager Elizabeth Knauss, Environmental Manager

DATE:

7/7/06

FILE NAME:

TECO Central Operations Center

PROJECT #: 296647

PROGRAM:

Hazardous Waste

COUNTY: Hillsborough

TYPE OF DOCUMENT:

Warning Letter

REQUESTED ACTION:

Signature

DESCRIPTION OF VIOLATIONS: Used oil transfer facility storing oil more than 35 days without a permit. Failure to comply with secondary containment and labeling requirements. Improper disposal of a small quantity of solvent contaminated rags. Universal waste was stored in a container in poor condition.

STATUS OF CORRECTIVE ACTIONS: additional documentation needed to confirm compliance with storage time frames.

STATUS OF PENALTY ASSESSMENT: Penalties were assessed in accordance with recent revisions to Department used oil penalty guidelines and ELRA.

PENALTY: Not Applicable

Amount:

\$8,500.00

Costs & Expenses:

\$ 250.00

Total: \$8,750.00

Secretary Approval Not required



Department of Environmental Protection

Jeb Bush Governor Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

August 2, 2006

Ms. Beverly Morgan Tampa Electric Company P. O. Box 111 Tampa, FL 33601-0111

Re:

Request for Information FLD 981 477 904

Hillsborough County

Dear Ms. Morgan:

Attached per your request are copies of the photographs taken during the March 14, 2006 inspection of the Central Maintenance facility. In addition, I have enclosed copies of Shannon Camp's field notes. For routine inspections, I do not retain my notes after I complete my inspection reports.

If you wish to discuss anything further before our meeting August 15th at 10:00 a.m., please call me at 813/632-7600 ext 383.

Sincerely yours,

Elizabeth Knauss

Hazardous Waste Compliance

Southwest District

EBK/ebk

Attachment

"More Protection, Less Process"



Department of Environmental Protection

En S

Jeb Bush Governor Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

July 11, 2006

Ms. Beverly Morgan Tampa Electric Company P. O. Box 111 Tampa, FL 33601-0111

Re:

Warning Letter #296647 FLD 981 477 904

Hillsborough County

Dear Ms. Morgan:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. Hazardous waste program field inspections conducted on March 14, 2006 indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection reports. Section 10 of the reports lists summaries of alleged violations of Department Rules.

Sections 403.161 and 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facilities that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Elizabeth Knauss at (813)632-7600, extension 383, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), F.S. If after further investigation the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order, which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy, the penalties which would be assessed in this case are \$8,500.00. Department costs are a minimum of \$250.00.

"More Protection, Less Process"

Tampa Electric Company - Central Operations Center FLD981477904 Hillsborough County

If this investigation confirms that your facility is significantly out of compliance, and the case is not resolved through timely entry of a Consent Order, under the Department's agreement with the EPA, a formal referral for judicial action must be made to the Department's Office of General Counsel. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

1. M Farley

Interim District Director Southwest District

Tuley

JMF/ebk

Attachment

cc: Jim Cook, TECO
Kelley Boatwright, HEPC
Mike Redig, HWR Section
Compliance File

PROPOSED PENALTY SUBJECT TO FINAL APPROVAL

Violator's Name: _Ta	ampa Electric Company Central Ope	rations		
Identify Violator's Fa	acility: 2200 E. Sligh Ave. Tampa	FLD9	81477904	
Name of Departmen	nt Staff Responsible for the Penalty C	omputations:_	Elizabeth Knauss	· .
ComHaz Case #:	296647	Date:	June 28, 2006	

	Violation Type	Manual Guide	Potential for Harm	Extent of Deviation	Matrix Range	Multi Day	Other Adjustments	Total
1.	262.11 solvent wiper identification & disposal	3.1	Minor	Minor	\$549 \$100	100		\$500
2.	62-710.401(6) 279.22(c)(1) used oil dolly labels, 2 containers outside containment	26.2	403.12	21(5) F.S.	\$500			\$500
3.	62-710.800 transfer facility secondary containment verification	25.1	403.1	21(4)(c)	\$3,000			\$3,000
4.	279.45(d) 62-710.401 storing used oil >35 days without a permit	25.6	403.1	21(4)(b)	\$4,000			\$4,000
5.	62-737.400(5) universal waste lamp storage	ELRA	403.12	21(5) F.S	\$500			\$500
	Subtotal							\$8,500
	De	partment (Costs					\$250
		TOTAL					·	\$8,750

M. Farley Interim District Director Southwest District



Department of Environmental Protection

jeb Bush Governor Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

Telephone: 813-632-7600 HAZARDOUS WASTE INSPECTION REPORT

1.	INSPECTION TYPE: [Routine Complaint Follow-Up Permitting Pre-Arranged
	NAME Tampa Electri	c Company, Central OPS EPA ID # FLD981477904
	STREET ADDRESS	2200 E. Sligh Avenue, Tampa
	MAILING ADDRESS	P.O. Box 111, Tampa, Florida 33601-0111
	COUNTY Hillsboroug	h PHONE 813/275-3069 DATE 3/14/06 TIME 10:00 am
NO	$OTIFIED AS:$ \square N	/A CURRENT STATUS:
	Non Handler CESQG (<100 kg SQG (100-1000 k) Generator (>1000 Transporter Transfer Facility Interim Status TSI TSD Facility Unit Type(s): Exempt Treatmen Used Oil: Transport	g/mo.) SQG (100-1000 kg/mo.) Generator (>1000 kg/mo.) Transporter Transfer Facility D Facility Interim Status TSD Facility TSD Facility Unit Type(s): Exempt Treatment Facility
2.	APPLICABLE REGUL ✓ 40 CFR 261.5 ✓ 40 CFR 265 ✓ 40 CFR 279	ATIONS:
3.	RESPONSIBLE OFFIC	CIAL(s):
	Beverly Morgan, Enviror	nmental Technician
4.	INSPECTION PARTIC	IPANTS:
	Beverly Morgan, TECO Jim Cook, TECO	Elizabeth Knauss - FDEP Shannon Camp - FDEP
5.	LATITUDE/LONGITU	DE 28° 00' 45" 82° 25' 58"
6.	SIC Code: 4911	NAICS Code: 221122
7.	TYPE OF OWNERSHI	P: <u>Private</u> Federal State County Municipal
8.	PERMIT #: N/A	ISSUE DATE: FYD DATE.

"More Protection, Less Process"

9. PROCESS DESCRIPTION:

Tampa Electric Company's Central Operations Center was inspected March 14, 2006 to determine its compliance with state and federal hazardous waste regulations. The facility has been a large quantity hazardous waste generator in the past, but is currently generating very small quantities of regulated hazardous waste. The facility filed a change of status form dated March 10, 2006 to update the facility's status. However, the notification also deleted the facility's status as a used oil transporter and transfer facility. Tampa Electric Company also transports used transformer oil to this location for consolidation. As the company transports more than 55 gallons of oil at a time, and stores oil more than 24 hours, it is subject to 40 CFR Part 279 used oil transporter and transfer facility requirements. The facility is not subject to used oil transporter certification requirements in FAC Rule 72-710.600.

In the past, used oil was transferred to a power plant to be burned for energy recovery after specification testing. Currently, the oil is disposed of to US Filter, a used oil processor, and TECO does not determine whether the oil meets specification. Therefore the facility is no longer required to comply with used oil marketer requirements. The facility was storing used oil in a number of tanks and containers on site. The primary area of concern was that used oil was being stored in a tank trailer that was stored outside on pavement. The paved area had curbs on each side and had speed bumps on both ends, but the facility did not have documentation that the capacity was adequate compared to the size of the trailer compartment. This is a requirement for all used oil transfer facilities per 40 CFR 279.45(d) and is a new requirement for used oil generators pursuant to FAC Rule 62-710.401(6). The containment must be impervious to oil. Further, the oil was not being picked up once every 35 days. Transporters who store used oil more than 35 days must comply with used oil processor standards.

Ms. Morgan had been under the impression that used oil from transfer operations was being disposed of at least once every 30 days. Instead, while US Filter picked up oil at the facility regularly, the units storing oil generated off site were not being emptied unless space was needed. TECO agreed to ship the oil at least once every 30 days rather than come into compliance with state used oil permit requirements. TECO was operating without a permit, a violation of FAC Rule 62.710.800(1). Inspection for compliance with these requirements was difficult as the facility's oil disposal records were scattered among the various shops on site.

Operations on site have not changed since the previous inspection, and include vehicle repair and maintenance, a paint shop, vehicle fueling, a vehicle wash rack, transformer repair, investment recovery and facility services. These have been described previously. TECO continues to store remediation waste on site from transformer releases pending receipt of analytical results. Recovered soil and debris is stored in covered containers on pavement.

This inspection began in the garage. According to Jim Cook, the facility's parts washer waste has been tested and was not TC toxic. Oil is managed through a vacuum system. The collection tank was properly labeled and double walled. Most of the used oil containers were also properly labeled. Wheeled oil dollies were also present, and not all were labeled. TECO must label all used oil dollies in accordance with 40 CFR 279.22(c)(1). A store room for flammable materials in this building contained drums of product, off specification fuel and a satellite accumulation container of used mineral spirits from parts washers. Oil stains were noted on the concrete floor, but these did not appear to be fresh. Residues appeared to have been cleaned up properly. Aerosol cans from this area are transferred to Material Recovery for processing.

The facility has reduced its painting operations. A closed and labeled satellite accumulation drum was located outside one of the paint booths. A 5-gallon safety can used to collect waste next to the painter's work table was open. If TECO generated more than 100 kg of hazardous waste in a calendar month, this would be a violation of 40 CFR 262.34(c)(i). An eye wash station did not have an inspection tag, but was working properly. Other emergency equipment was operational and inspected regularly as part of the facility's SPCC plan. TECO is also maintaining training records.

The hazardous waste storage area contained one container of aerosol cans of lubricants and cleaners, one container of paint waste, 2 pallets of automotive batteries and two universal waste battery containers. A drum of bead blast waste was being collected, and it was estimated that it took 3 to 5 years to fill the drum.

Two 55-gallon drums labeled "used oil" were located outside of Investment Recovery, under a roof but without secondary containment as required by FAC Rule 62-710.401(6). This was corrected during the inspection by placing the drums on a containment pallet. In addition, a Gaylord box of universal waste lamps was not properly covered, in violation of FAC Rule 62-737.400(1).

In the transformer repair shop, a small container of F005 lacquer thinner was found. Staff said that the solvent was being used with rags for cleaning, and that the wipers were being disposed of in the trash. The shop foreman was not aware that the spent wipers were contaminated with a listed hazardous waste, a violation of 40 CFR 262.11. This issue was discussed, and the shop foreman said that he could substitute isopropanol for the lacquer thinner.

10. Summary of Violations:

40 CFR 279.22(c)(1)

40 CFR 262.11	Failure to conduct a hazardous waste determination on F005 solvent contaminated wipers.
40 CFR 279.22(c)(1)	Storage of used oil in unlabeled containers.
40 CFR 279.45(d)	Storage of used oil in containers without adequate secondary containment at a used oil transfer facility.
62-710.401(6) F.A.C.	Storage of used oil generated on site in containers without secondary containment. (corrected)
62-710.800(1) F.A.C.	Failure to obtain a permit as a used oil processor while storing used oil in a transfer facility for more than 35 days.
62-737.400(5) F.A.C.	Failure to store spent universal waste lamps in closed containers, labeled "Universal Waste - Lamps," "Waste Lamps" or "Used Lamps."
11. Corrective Actions:	
40 CFR 262.11	Review hazardous waste listings with responsible staff to ensure that all hazardous wastes are properly identified prior to disposal.

Label all oil dollies with the words "Used Oil."

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40 CFR 279.45(d)

Submit information to demonstrate that the tank trailers storing used oil transported to the facility parked more than 24 hours have impervious secondary containment, capable of containing 110% of the trailer contents. If the containment is determined to be inadequate, submit a corrective action proposal to the Department.

62-710.800(1) F.A.C.

Submit copies of all used oil disposal records from the facility since March 1, 2006 to the Department to document return to compliance with this requirement.

62-737.400(5) F.A.C.

Store spent universal waste lamps in closed containers, labeled "Universal Waste - lamps," "Waste Lamps" or "Used Lamps."

12. Other Recommendations:

40 CFR 262.34(c)(1)(i)

Keep all satellite accumulation containers closed except when adding or removing waste. Keeping satellite containers open will result in improper disposal of hazardous waste by evaporation.

40 CFR 279.43

Improve used oil transporter recordkeeping. Separate records for used oil generated on site from records for transported used oil.

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